



US EPA RECORDS CENTER REGION 5



484666

**INDUSTRIAL DISPOSAL SERVICE YOU CAN DEPEND ON**

KANKAKEE INDUSTRIAL DISPOSAL, INC. • P.O. BOX 742 • 1360 EAST LOCUST ST. KANKAKEE, ILLINOIS 60901  
GARAGE 933-2931 MOBIL PHONE 933-1777 CAR 17 OFFICE 933-3961

September 4, 1981

U.S. EPA  
Compliance Section  
Water & Hazardous Materials  
Enforcement Branch  
Mr. Arnold Leder, Chief  
230 South Dearborn St.  
Chicago, Illinois 60604

ILLD054155080

**RECEIVED**

Ill. 0066

SEP 08 1981

**ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS**

Dear Mr. Leder:

Attached is the drum listing sheet and breakdown on the drums from the yard of Birmingham Bolt of Illinois at Peotone, Ill. I am going to send a copy of the breakdown along with the samples for further analysis and varifying to Chemical Waste Management. Upon their finding, permit applications will be made out along with the proper notification, etc. and sent to Illinois EPA at Springfield for permitting.

This is a Hazardous material and it looks like their will be three (3) permits needed. One for drum burial at E.S.L. and two (2) for CID at Calumet City for nutralization.

I will contact you as soon as I get results back from Chemical Waste Management as to their findings.

Very Truly Yours,

  
Howard Kinneman

cc: Birmingham Bolt of Illinois  
Ken Bechely, IEPA

# Permit Application for these to E.S.L. - Elwood, Ill.

Item No's	Gallons
1	18
2	18
3	55
4	18
5	35
6	55
7	50
11	40
12	40
13	20
14	45
15	30
16	50
17	2
18	18
19	25
20	55
21	55
22	15
23	28
25	30
26	45
27	28
28	55
29	42
30	40
31	30
32	40
46	7
47	8
52	10



# Permit Application for these at E.S.L. - Elwood, Ill. Con't.

Page 2

Item No's	Gallons
53	15
54	35
55	12
56	25
57	55
59	15
60	55
61	40
62	10
63	25
64	50
65	30
66	30
67	4
68	25
69	40
70	50
71	35
72	48
73	25
74	8
75	50
76	40
77	50
78	15
79	30
80	50
81	30
82	40
83	50
84	45

Permit Application for these to E.S.L. - Elwood, Ill.

Page 3

Item No's

Gallons

85

55

86

45

87

40

88

40

89

55

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Total 2,274 Gals.

# Permit Application for these to CID - Calumet City

Low P/H

Item No's

Gallons

9	55
24	18
33	40
34	25
35	25
37	30
38	20
39	50
41	10
44	50
45	40
49	50
50	40
51	55

Total 508 Gals.

Permit Application for these at CID - Calumet City.

High P/H

Item No's

Gallons

8

55

10

50

40

18

Total

123

## WASTE CHARACTERISTICS

KID, INC. KANKAKEE INDUSTRIAL DISPOSAL, INC.  
P.O. Box 742 1360 E. Locust St.  
Kankakee, Ill. 60901  
Fed: ILD054155080

ITEM #	WASTE NAME	QUANTITY	SOLID - LIQUID	OXIDIZER	INORGANIC ACIDS	BASES	REDUCERS	PESTICIDES	FLAMMABLE	NON-FLAMMABLE	INERTS	FLASH POINT	PH	ADDITIONAL DATA
1	Clear Coat	18 Gals	S									> 200		Clear Solid Box 1
2		18 Gals	S									> 200	4.3	Filter Paper Box 1
3	White Paint	55 Gals	L									83		Box 1
4	Clear Coat	18 Gals	SS									79	6.0	Junk Box 1
5	Green Enamel	35 Gals	L									76		Looks Good Box 1
6	Clear Epoxy	55 Gals	S									> 200		Junk - Hard Box 1
7	Beige Enamel	50 Gals	L									78		Box 1
8		55 Gals	L									> 200	13.4	Dark Red - Transparent
9		55 Gals	L									> 200	0.1	Clear Box 3
10		50 Gals	L									> 200	12.1	Maroon - Transparent
11	White Undercoat	40 Gals	S.S.									78	6.5	Junk Box 1
12	Clear Coat	40 Gals	L									78	5.0	Junk Box 1
13	Tan Bake Enamel	20 Gals	S									> 200		Tan - Rubbery Box 1
14	Lt. Grey Enamel	45 Gals	L									78		Box 1
15	Junk Primer	30 Gals	S									> 200		Rust Color - Rubbery - Junk Box 1
16	Filter Sludge	50 Gals	S-L									> 200	7.35	Filter Sludge Box 1
17	Hard Paint Primer	3" in Drm	S											No Sample taken
18	Black Enamel	18 Gals	L									84		Black Box 1
19	Brown Enamel	25 Gals	L									79		Box 1
20	Clear Coat	55 Gals	S									> 200		Brown - Rubbery

COMPANY: Birmingham Bolt of Illinois

Peotone, Illinois

BY: \_\_\_\_\_

DATE: \_\_\_\_\_



## WASTE CHARACTERISTICS

KID, INC. KANKAKEE INDUSTRIAL DISPOSAL, INC.  
P.O.Box 742 1360 E. Locust St.  
Kankakee, Ill. 60901  
Fed: ILD054155080

ITEM #	WASTE NAME	QUANTITY	SOLID - LIQUID	OXIDIZER	INORGANIC ACIDS	BASES	REDUCERS	PESTICIDES	FLAMMABLE	NON-FLAMMABLE	INERTS	FLASH POINT	PH	ADDITIONAL DATA
21	Junk - water	55 Gals	L-S									> 200	8.45	
22	Junk Enamel	15 Gals	S									> 200		Solid-as Rubber Box 4
23	Clear Cover	28 Gals	S-S									78		Clear
24		18 Gals	L									> 200	2.10	Clear - in Stainless Steel Drum Box 2
25	Junk Enamel	30 Gals	S									> 200		Rubbery Solid Box 4
26	Red Enamel	45 Gals	L									74		Red Box 4
27	Red Enamel	28 Gals	L									79		Red Box 4
28	White Enamel	55 Gals	L									78		Box 4
29	White Enamel	42 Gals	L									78		Looks Good Box 4
30	Tan Coat	40 Gals	L-S									76		Junk Box 4
31	White Undercoat	30 Gals	L									84		Junk Box 4
32	Tan Coat	40 Gals	L									79		Junk Box 4
33		40 Gals	L									> 200°	0.20	Clear Box 3
34		25 Gals	L									> 200°	0.60	Clear Box 3
35		25 Gals	L									> 200°	0.41	Clear - BROWN Box 3
36	No Sample.	MT												MT Drum.
37		30 Gals	L									> 200°	0.50	Clear Box 3
38		20 Gals	L									> 200°	1.55	Clear Box 3
39		50 Gals	L											Clear - Amber No %H Box 3
40		18 Gals	L										11.5	Clear - Yellow Green

COMPANY: Birmingham Bolt of Illinois  
Peotone, Illinois

BY: \_\_\_\_\_

DATE: \_\_\_\_\_

## WASTE CHARACTERISTICS

KID, INC. KANKAKEE INDUSTRIAL DISPOSAL, INC.  
P.O.Box 742 1360 E. Locust St.  
Kankakee, Ill. 60901  
Fed: ILD054155080

ITEM #	WASTE NAME	QUANTITY	SOLID - LIQUID	OXIDIZER	INORGANIC ACIDS	BASES	REDUCERS	PESTICIDES	FLAMMABLE	NON-FLAMMABLE	INERTS	FLASH POINT	PH	ADDITIONAL DATA
41		10 Gals	L									1.20		Clear - Black in 20 Container Box
42	MT - Container Broken	MT												20 Gal. Plastic Container - Broken
43	MT	MT												Rusted out Drum
44		50 Gals	L									> 200	0.15	Iodine looking Box 3
45		40 Gals.	L											Clear (same as # 38) (Fibre Drum)
46		40 lbs	S									> 200		Orange - Powder - In Plastic Bag & Fibre Drum Box 4
47		50 lbs.	S									> 200		Orange - Same as # 46
48		MT												
49		50 Gals	L									> 200	0.41	Amber - Drm. Rusted out - Liner O.K. Box 3
50		40 Gals	L									> 200	0.53	Amber - Fibre Drum Box 3
51		55 Gals	L									> 200	0.60	Clear - Fibre Drum Box 3
52		60 lbs	S									> 200	5.45	Gray Powder - Drum Rusted out Box 4
53	White Enamel	15 Gals	SS									> 200		2/3 solid - Junk & water Box 2
54	Beige Enamel	35 Gals	L									122		Looks Good Box 2
55	Blue Enamel	12 Gals	SS									79		Looks Good
56	Clear Epoxy	25 Gals	S									> 200		Junk Junk Box 2
57	Clear Epoxy	55 Gals	S									> 200		Junk Box 4
58		MT												
59	Clear Coat	15 Gals	S									> 200		Rubbery Box 4
60		55 Gals	S									> 200		Cleanings - Hard

COMPANY: Birmingham Bolt of Illinois  
Peotone, Illinois

BY: \_\_\_\_\_

DATE: \_\_\_\_\_





KID, INC. KANKAKEE INDUSTRIAL DISPOSAL, INC.  
P.O.Box 742 1360 E. Locust St.  
Kankakee, Ill. 60901  
Fed: ILD054155080

KID, INC. KANKAKEE INDUSTRIAL DISPOSAL, INC.  
P.O.Box 742 1360 E. Locust St.  
Kankakee, Ill. 60901  
Fed: ILD054155080

COMPANY: Birmingham Bolt of Illinois BY: \_\_\_\_\_ DATE: \_\_\_\_\_  
Peotone, Illinois

COMPANY: Birmingham Bolt of Illinois BY: \_\_\_\_\_ DATE: \_\_\_\_\_  
Peotone, Illinois





Chemical Waste Management of Illinois, Inc.

P.O. Box 1296  
Calumet City, Illinois 60409  
312/891-1500

October 19, 1981

RECEIVED

NOV 04 1981

ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

Mr. Wally El-Beck  
Illinois E.P.A.  
Land/Noise Pollution Control  
Permit Section  
2200 Churchill Road  
Springfield, IL 62706

Dear Wally:

Enclosed please find four (4) separate disposal permit applications for eighty-nine (89) abandoned drums containing hazardous wastes from Illinois Birmingham Bolt's plant in Kankakee, Illinois. Per Hak Cho (U.S.E.P.A.), Arnold Leder (U.S.E.P.A.), and Ken Bechely (I.E.P.A.), Kankakee Industrial Disposal, Inc. will be listed as the generator since they have a Federal I.D. number as a generator of hazardous waste; whereas Illinois Birmingham Bolt does not have a Federal I.D. number. They just recently moved into their Kankakee facility and found that these drums were left there by the former occupant. Also, Kankakee Industrial Disposal has assured me that prior to shipment, any damaged drum will be packaged in an "overpack".

The attached fingerprint analyses were performed by Kankakee Industrial Disposal and Chemical Waste Management of Illinois. Per these analyses, the drums were divided into four (4) groups. Group "A" consists of thirty-seven (37) drums of flammable paint and resin wastes (D001). Group "B" consists of thirty-five (35) drums of non-flammable water-based or oil-based paint sludges, solidified resins, and empties (D007 and D008 were assigned in lieu of performing extensive analyses). Group "C" consists of three (3) drums of liquid caustic wastes (D002). Group "D" consists of fourteen (14) drums of liquid acid wastes (D002). I feel that Chemical Waste Management of Illinois can safely dispose of these drums via the following disposal methods: Group "A" - 05 at ESL, Group "B" - 07 at ESL, Group "C" - 07 at ESL, and Group "D" - 15/04 at CID.

Thank you very much for your cooperation in this matter. If you should have any questions, please feel free to contact me.

Sincerely,

Chemical Waste Management of Illinois

*William R. Karpas*  
William R. Karpas

Technical Manager, Laboratory Services

WRK/sfk

Encl:

cc: Tom Tomaszewski, CWM  
Gary Coker, CWM  
Kirk Stemple, ESL  
✓ Howard Kinneman, KID



RECEIVED

October 22, 1981

OCT 27 1981

Illinois Environmental Protection Agency  
Rama K. Chaturvedi, Manager  
Division of Land/Noise Pollution Control  
2200 Churchill Road  
Springfield, Ill. 62706

ILL. EPA - D.L.P.C.  
STATE OF ILLINOIS

Dear Mr. Chaturvedi;

This is in reference to an application of permit for Birmingham Bolt of Peotone to dispose of drum material that was left on the property by previous owner.

Mr. Arnold Leder of the U.S. EPA and Mr. Ken Beechley from the Illinois EPA are aware of the work done so far in preparing to clean up and dispose of said drums by us, ( KID, Inc. ). I have been in contact with these people, keeping them informed.

I would like to request an emergency special permit to remove these drums because of the hazards involved. These drums are not inclosed by any means. They are not around any homes or buildings but are in a field approximately 75 to 100 yards from the plant. Not being enclosed does pose as a hazard because of the acids and flammables that the drums contain. Thank you for your consideration on this matter.

Very Truly Yours,

*Howard Kinnerman*

Howard Kinnerman

cc: Mr. Arnold Leder - USEPA  
Mr. Ken Beechley - ILI-EPA  
Mr. J. Offerman - Birmingham Bolt



INDUSTRIAL DISPOSAL SERVICE YOU CAN DEPEND ON

KANKAKEE INDUSTRIAL DISPOSAL, INC. • P.O. BOX 742 • 1360 EAST LOCUST ST. KANKAKEE, ILLINOIS 60901  
GARAGE 933-2931 MOBIL PHONE 933-1777 CAR 17 OFFICE 933-3961

November 2, 1981

RECEIVED

NOV 04 1981

U.S. EPA Compliance Section  
Water & Hazardous Materials  
Enforcement Branch  
Mr. Arnold Leder, Chief  
250 South Dearborn St.  
Chicago, Illinois 60604

ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

Dear Mr. Leder;

Enclosed is a cover letter from Waste Management (William Karpas) to the Illinois EPA for four (4) permit applications per 99 drums of waste at Illinois Birmingham Bolt, Peotone, Ill.

I sent a followup letter on this to Rama Chaturvedi, Manager, with the Illinois EPA at Springfield requesting an emergency permit. I have not had a reply to my request as of this date.

I will keep you advised on this matter.

Very Truly Yours,

Howard L. Kinneman

cc: Ken Bechely, EPA  
J. Offerman, Birmingham Bolt

STATIONARY PACKERS • GARBAGE PACKER • SEMI DUMP • SEMI TANKER

RENTAL OF TRASH PUMPS — PORTABLE AIR COMPRESSORS, SAND BLASTING AND CONCRETE BREAKING EQUIPMENT



**INDUSTRIAL DISPOSAL SERVICE YOU CAN DEPEND ON**

KANKAKEE INDUSTRIAL DISPOSAL, INC. • P.O. BOX 742 • 1360 EAST LOCUST ST. KANKAKEE, ILLINOIS 60901  
GARAGE 933-2931 MOBIL PHONE 933-1777 CAR 17 OFFICE 933-3961

November 29, 1982

**RECEIVED**

U.S.E.P.A.  
Compliance Section  
Water & Hazardous E.B.  
Mr. Phil Kaplan  
230 South Dearborn St.  
Chicago, Illinois 60604

ILLD054155080 DEC 02 1982  
ILL. 0066  
ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

Dear Mr. Kaplan,

Per your request, I've enclosed copies of the Illinois Permits for disposal of these various waste materials from Illinois Birmingham Bolt Company at Peotone, Illinois. Recovery drums were used as needed (8 in all). I think all of the information that you would need can be found on the manifests. If you would need more, please contact me.

We scraped and leveled the area of ruts that were cut by us while getting the drums out of the area. I took plug samples at four different spots where the drums were storred. The top or surface sample ran a pH of 6.95 and the three (3) inch depth ran a pH of 6.30. They do not plan on any vegetation being there. They are going to put a driveway thru that area.

You should have the list and results of the analysis of these drums.

If there is any more information that you would need, please call me at: 815/933-2931.

Very Truly Yours,

*Howard Kinneman*  
Howard Kinneman

cc: Ken Bechaly, IEPA  
Ill. Birmingham Bolt Co.

CHUCK —

ANY COMMENTS

*R*



TO BE COMPLETED BY  
WASTE GENERATOR

ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF LAND POLLUTION CONTROL  
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706  
(217) 782-6760  
SPECIAL WASTE HAULING MANIFEST

Authorization Number 812590  
8 13

Kankakee Industrial Disp. 1360 E Locust St. 8159332931 0190550020 G  
(Company Name) Address Phone Number 14 Generator Number 24  
Kankakee Illinois 60901 ILD054155080  
City State Zip EPA Number

WASTE HAULER(S)

K.I.D. Inc. 1360 E. Locust  
Hauler Name Hauler Address  
Kankakee, Ill. 8159332931 ILD054155080  
City State Zip Phone Number EPA Number

S.W.H. Registration Number 0066008  
25 31

S.W.H. Registration Number 0066008  
32 38

Hauler Name Hauler Address  
Phone Number EPA Number

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE  
E.S.L. Inc. Rt. 1 Box 109, Laraway Rd. 19704502  
(Facility Name) Address 39 Site Number 46  
Elwood Illinois 60421 8157276148 ILD074411745  
City State Zip Phone Number EPA Number

Alternate (Facility Name) Address  
City State Zip Phone Number EPA Number

TO BE COMPLETED BY  
WASTE GENERATOR

WASTE NAME: Caustic Waste.

WASTE PHASE: Liquid

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

Waste Sodium Hydroxide Corrosive

UN1024  
UN or NA Number

D002  
EPA HW Number

WEIGHT FOR J.O.T. USE 1,290 LBS  
TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE  
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 000123 GALLONS (Circle One)  
CU. YDS. 1  
47 52 53

METHOD OF SHIPMENT (Circle One)

(DRUMS 3)  
Number

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A.

HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

Howard D. Kinnema  
(Authorized Signature)

DATE: 6-29-82

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

1) John Morris  
(Authorized Signature)

DATE 06/29/82  
54 59

2) John Morris  
(Authorized Signature)

DATE 06/29/82  
54 59

DISPOSAL, STORAGE, OR TREATMENT FACILITY\*

HAZARDOUS WASTE SUBJECT TO FEE YES X NO

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

John Morris  
(Authorized Signature)

DATE 06/29/82  
54 59

COMMENTS OR SPECIAL INSTRUCTIONS: E.S.L. #143325



TO BE COMPLETED BY  
WASTE GENERATOR

ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF LAND POLLUTION CONTROL  
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706  
(217) 782-6760  
SPECIAL WASTE HAULING MANIFEST

Authorization Number 8 1 2 5 8 8  
8 13

Kankakee Industrial Disposal 1360 E. Locust St. 8 1 5 9 3 3 2 9 3 1 0 1 9 0 5 5 0 0 2 0  
(Company Name) Address Phone Number 14 Generator Number 24  
Kankakee Illinois 60901 IL D 0 5 4 1 5 5 0 8 0  
City State Zip EPA Number

WASTE HAULER(S)

Kankakee Industrial Disposal 1360 E. Locust Kankakee, Ill. 60901 S.W.H. Registration Number 0 0 6 6 0 0 8  
Hauler Name Hauler Address 25 31  
8 1 5 9 3 3 2 9 3 1 IL D 0 5 4 1 5 5 0 8 0  
Phone Number EPA Number

Hauler Name Hauler Address Phone Number EPA Number  
S.W.H. Registration Number 32 38

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE  
E.S.L. Inc. Rt. 1 Box 109, Laraway Rd. 1 9 7 0 4 5 0 2  
(Facility Name) Address 39 Site Number 46  
Elwood Illinois 60421 8 1 5 7 2 7 6 1 4 8 IL D 0 7 4 4 1 1 7 4 5  
City State Zip Phone Number EPA Number

Alternate (Facility Name) Address City State Zip Phone Number EPA Number  
Site Number 39 46

TO BE COMPLETED BY  
WASTE GENERATOR

WASTE NAME: Flammable Waste Paint & Resins

WASTE PHASE: Liquid

(Liquid, Gaseous, Solid)

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

Paint, Resins & Solvents FLAMMABLE

U N 1 2 6 3  
UN or NA Number

D 0 0 1  
EPA HW Number

WEIGHT FOR D.O.T. USE 13,260 lbs  
LBS TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 1 4 2 6 1  
47 52 53 GALLONS (Circle One) CU. YDS.

METHOD OF SHIPMENT (Circle One)

(DRUMS 37) Number

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

Flatbed Trailer

THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION. IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A.

HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

*Howard Kinnaman*  
(Authorized Signature)

DATE: 6-29-82

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE THE DESTINATION AS INDICATED:

(1) *John L. Harris*  
(Authorized Signature)  
(2) *John L. Harris*  
(Authorized Signature)

DATE: 06/29/82  
54 57  
DATE: / /

DISPOSAL, STORAGE, OR TREATMENT FACILITY\*

HAZARDOUS WASTE SUBJECT TO FEE YES ☒ NO

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

*Yuk L. Harris*  
(Authorized Signature)

DATE: 06/29/82  
60 65

COMMENTS OR SPECIAL INSTRUCTIONS: E.S.L. # 143325

IN ILLINOIS, 217 / 782-3637

\*24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS\*

OUTSIDE ILLINOIS 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 IEPA

PART 6 - GENERATOR

REV # 3

GENERATOR COPY — PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.



TO BE COMPLETED BY  
WASTE GENERATOR

ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF LAND POLLUTION CONTROL  
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706  
(217) 782-6760  
SPECIAL WASTE HAULING MANIFEST

Authorization Number 8 1 2 5 8 9  
8 13

Kankakee Industrial Disposal 1360 E. Locust St. 8 1 5 9 3 3 2 9 3 1 0 1 9 0 5 5 0 0 2 0 G  
(Company Name) Address Phone Number 14 Generator Number 24  
Kankakee Illinois 60901 I L D 0 5 4 1 5 5 0 8 0  
City State Zip EPA Number

WASTE HAULER(S)

Kankakee Industrial Disposal 1360 E. Locust St.  
Hauler Name Hauler Address S.W.H. Registration Number 0 0 6 6 0 0 8  
Kankakee, Ill. 60901 25 31  
8 1 5 9 3 3 2 9 3 1 I L D 0 5 4 1 5 5 0 8 0  
Phone Number EPA Number

Hauler Name Hauler Address S.W.H. Registration Number 32 38  
Phone Number EPA Number

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

E.S.L. Inc. Rt. 1 Box 109 Laraway Rd. 1 9 7 0 4 5 0 2  
(Facility Name) Address 39 Site Number 46  
Elwood Illinois 60421 8 1 5 7 2 7 6 1 4 8 I L D 0 3 4 4 1 1 7 4 5  
City State Zip Phone Number EPA Number

Alternate (Facility Name) Address 39 Site Number 46  
City State Zip Phone Number EPA Number

TO BE COMPLETED BY  
WASTE GENERATOR

WASTE NAME: Non-Flammable Waste Paint & Resins

WASTE PHASE: Semi-Solid

(Liquid, Gaseous, Solid)

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

Hazardous Waste, n.o.s.

~~HAZARDOUS~~ Hazardous

U N 9 1 8 9  
UN or NA Number

D 0 0 8  
D 0 0 7  
EPA HW Number

WEIGHT FOR D.O.T. USE 7,930 (LBS)  
TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE  
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 0 0 0 8 4 4 1 GALLONS (Circle One)  
47 52 2 CU. YDS. 53

METHOD OF SHIPMENT (Circle One)

(DRUMS 29)  
Number

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION.  
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

Howard Kinnema  
(Authorized Signature)

DATE: 6-29-82

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE  
THE DESTINATION AS INDICATED:

(1) [Signature]  
(Authorized Signature)

DATE 06/29/82  
54 57

(2) [Signature]  
(Authorized Signature)

DATE 1 1

DISPOSAL, STORAGE, OR TREATMENT FACILITY\*

HAZARDOUS WASTE SUBJECT TO FEE YES X NO

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE:

[Signature]  
(Authorized Signature)

DATE 06/29/82  
60 65

COMMENTS OR SPECIAL INSTRUCTIONS:

E.S.L. #143325

IN ILLINOIS 217 / 782-3637

\*24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS\*

OUTSIDE ILLINOIS 800 / 424 8802 or 202 / 426 2975

DISTRIBUTION PART 1 GENERATOR

PART 2 IEPA

PART 3 SITE

PART 4 HAULER

PART 5 IEPA

PART 6 GENERATOR

REV. # 3

GENERATOR COPY — PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.

TO BE COMPLETED BY  
WASTE GENERATOR

ENVIRONMENTAL PROTECTION AGENCY  
DIVISION OF LAND POLLUTION CONTROL  
2200 CHURCHILL ROAD, SPRINGFIELD, ILLINOIS 62706  
(217) 782-6760  
SPECIAL WASTE HAULING MANIFEST

0550514

Authorization Number 995366  
8 13

Kankakee Industrial Disposal 1360 E. Locust St. 815 933 2931 0190550020  
(Company Name) Address Phone Number 14 Generator Number 24  
Kankakee Illinois 60901 ILD054155080  
City State Zip EPA Number

WASTE HAULER(S)

Kankakee Industrial Disposal 1360 E. Locust Kankakee, Ill. 60901 S.W.H. Registration Number 0066018  
Hauler Name Hauler Address 25 31  
815-933-2931 ILD054155080  
Phone Number EPA Number

Hauler Name

Hauler Address

S.W.H. Registration Number

32

38

Phone Number

EPA Number

DESTINATION — DISPOSAL STORAGE OR TREATMENT SITE

Chemical Waste Mgmt. P.O. Box 1296 03160056  
(Facility Name) Address 39 Site Number 46

Calumet City Illinois 60409 312 891 1500 ILD010284248  
City State Zip Phone Number EPA Number

Alternate (Facility Name)

Address

39

Site Number

46

City

State

Zip

Phone Number

EPA Number

TO BE COMPLETED BY  
WASTE GENERATOR

WASTE NAME: Acid Waste

WASTE PHASE: Liquid - Solid

(Liquid, Gaseous, Solid)

THE SPECIAL WASTE BEING TRANSPORTED UNDER THIS MANIFEST IS OF THE DOT HAZARD CLASSIFICATION INDICATED IMMEDIATELY BELOW:

SHIPPING DESCRIPTION:

HAZARD CLASS:

Waste Liquid Acid, n.o.s. Corrosive

UN1760  
UN or NA Number

D002  
EPA HW Number

WEIGHT FOR D.O.T. USE 5,840 LBS  
TONS (circle one)

WEIGHT FOR I.E.P.A. USE MUST BE  
CONVERTED TO CU. YDS. OR GAL.

QUANTITY OF WASTE DELIVERED: 000368  
47 52 1 GALLONS (Circle One)  
2 CU. YDS 1  
53

METHOD OF SHIPMENT (Circle One)

(DRUMS 9)  
Number

TANK TRUCK

OPEN TRUCK

OTHER (Specify)

THIS IS TO CERTIFY THAT THE ABOVE-NAMED WASTE ARE PROPERLY CLASSIFIED, DESCRIBED, PACKAGED, MARKED, AND LABELED AND IS IN PROPER CONDITION FOR TRANSPORTATION.  
IN ACCORDANCE WITH THE APPLICABLE REGULATIONS OF THE ILLINOIS DEPARTMENT OF TRANSPORTATION AND I.E.P.A.

I HEREBY AGREE TO AND CERTIFY THE ABOVE WRITTEN INFORMATION

(Authorized Signature)

DATE: 11-9-82

WASTE HAULER

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND QUANTITY HAS BEEN ACCEPTED IN PROPER CONDITION FOR TRANSPORT AND I ACKNOWLEDGE  
THE DESTINATION AS INDICATED:

(1) John D. Higgins  
(Authorized Signature)

DATE: 11/09/82  
54 55

(2) (Authorized Signature)

DATE: 11/09/82

DISPOSAL, STORAGE, OR TREATMENT FACILITY\*

HAZARDOUS WASTE SUBJECT TO FEE YES ☒ NO ☐

I HEREBY CERTIFY THAT THE ABOVE-DESCRIBED WASTE AND INDICATED QUANTITY HAS BEEN ACCEPTED AT THE SITE SPECIFIED ABOVE

(Authorized Signature)

DATE: 11/09/82  
60 65

COMMENTS OR SPECIAL INSTRUCTIONS:

IN ILLINOIS 217 / 782-3637

\*24 HOUR EMERGENCY AND SPILL ASSISTANCE NUMBERS\*

OUTSIDE ILLINOIS 800 / 424-8802 or 202 / 426-2675

DISTRIBUTION PART - 1 GENERATOR

PART - 2 IEPA

PART - 3 SITE

PART - 4 HAULER

PART - 5 IEPA

PART 6 - GENERATOR

REV #3

GENERATOR COPY — PART 1 - DO NOT REMOVE PART 1 FROM SET UNTIL COMPLETED.



SEP 24 1981

5ENVIRIC

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Howard Kinneman  
Kankakee Industrial Disposal  
P.O. Box 742  
Kankakee, Illinois 60901

RECEIVED  
00102 1981  
ILL. EPA - D.L.P.C.  
STATE OF ILLINOIS

Dear Mr. Kinneman:

Thank you for your letter of September 4, 1981 and the waste analysis from the Birmingham Bolt facility.

As you are aware, the Birmingham Bolt Company is currently in noncompliance with numerous requirements of the Resource Conservation Recovery Act. In view of this, please provide me with your plans which will accomplish removing the hazardous wastes from the Birmingham Bolt Company property to permitted hazardous waste facilities within 30 days of receipt of this letter. You are further advised that failure to remove the wastes in the 30 day time frame may result in the initiation of Federal enforcement in this matter.

Please contact me if you have any questions at 353-2114.

Sincerely yours,

Original Signed by: Arnold E. Leder

Arnold E. Leder, Chief  
Compliance Section  
Water & Hazardous Materials  
Enforcement Branch

cc: Ken Beechley  
Illinois Environmental Protection Agency

Jerry Offerman, Plant Manager  
Birmingham Bolt

# WATER POLLUTION CONTROL/FOS INSPECTION & SAMPLE COLLECTION REPORT

Facility Name Chillicothe Birmingham + B&B Date/Time 04-01-82  
 Location Kanika Rec  
 Person(s) Interviewed asst manager Title

## A. GENERAL OBSERVATIONS

Weather warm - sunny  
 Flow: Total Completely Treated \_\_\_\_\_ (mgd or gpm) Time \_\_\_\_\_  
 Total Being Bypassed \_\_\_\_\_ (mgd or gpm) Time \_\_\_\_\_  
 Effluent Disinfection: Chlorine Gas \_\_\_\_\_ pounds/day  
 Liquid Chlorine \_\_\_\_\_ % solution at a rate of \_\_\_\_\_ gal./day  
 Effluent Chlorine Residual at receiving stream \_\_\_\_\_ mg/l

## B. FACILITY INSPECTION

Treatment Process: 1. A/S 2. TF 3. RBC 4. Lagoon 5. Phys/Chem 6. \_\_\_\_\_  
 Unit Description(s) \_\_\_\_\_ Observed Condition \_\_\_\_\_

Preliminary \_\_\_\_\_

Primary \_\_\_\_\_

Secondary oil lagoon Lagoon extremely heavy with oil with inadequate separation at discharge

Post Treatment \_\_\_\_\_

Sludge Handling/Disposal \_\_\_\_\_

Treatment Units out of service & reason: \_\_\_\_\_

Will return to service on \_\_\_\_\_

## C. SAMPLE COLLECTION/OBSERVATIONS

Effluent sample collected at outfalls to ditch by C. Kallis

Type: Grab ☒ \_\_\_\_\_, Time 1045-1130

Composite \_\_\_\_\_ Hours, from \_\_\_\_\_ to \_\_\_\_\_ Flow Prop? \_\_\_\_\_

Witness(es) \_\_\_\_\_

Other Samples Collected: Location/Type sample also collected

From oil separator + creek.

### OBSERVATIONS (describe)

	Effluent at Stream	Receiving Stream
Color & Clarity:	<u>very turbid</u>	<u>very turbid</u>
Susp. Solids:	<u>many</u>	<u>many</u>
Floatage:	<u>oil film</u>	<u>oil film</u>
Odor:	<u>oil smell</u>	<u>oil smell</u>
Others:	_____	_____
Sludge-like Deposits:	_____	_____

## D. REMARKS

Problems/Deficiencies/Operator Comments: great oil separator. For groundwater was in satisfactory condition.

Inspected by C. Kallis Date Submitted 04-01-82

Reviewed by [Signature] Followup Required Resample when

Ases



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

DATE: February 10, 1983  
TO: File  
FROM: Chris Kallis, EPT  
SUBJECT: Illinois Birmingham & Bolt  
NPDES #IL 0035297

On Wednesday, February 9, 1983 I performed a reconnaissance inspection on the Illinois Birmingham & Bolt Co. in Kankakee. Discharge 001 consists entirely of ground water runoff treated by an oil separator. Discharge 002 consists of a 3 phase lagoon system used mainly for treating and recirculation of process cooling water for steel melting and molding plants (see attached diagram).

Accompanied by Ernst J. Mooney, General Manager, I observed a minor discharge from oil separator - 001 that appeared in compliance. The oil separator was in satisfactory condition. Please note that a cleaning is due this summer. There was no discharge from 002.

The lagoon system has been modified so it is impossible to discharge except in extreme flooding conditions to prevent overflow. The old discharge from the second stage lagoon has been removed and the ditch has been filled with dirt. Three curved overflow pipes have been installed in the third cell extending from the bottom of the lagoon (for minimal oil concentration in case of discharge) to a point above lagoon level. This has resulted in a change of a discharge point of several yards to the north. As mentioned earlier there was no sign of present or previous discharge.

The lagoons appeared purplish in color with heavy oil concentrations floating on top. Mooney mentioned that he planned to clean out the lagoons this summer by pumping out water from the bottom into the ditch and having the oil hauled out by a licensed hauler. I informed him of the need to notify the Maywood Office at least one week before this undertaking.

CK:wn

CC - DWPC/FOS/RU

IEWP PERMITS

Eps maywood

Environmental Protection Agency  
State of Illinois



Illinois Birmingham + B. It

backnight road

OFFICE

warehouse

oil separator

manufacturing  
plant

new discharge

pump room  
or recirculation

oil storage  
area

cell 1

cell 3

cell 2

old discharge now

STATE OF ILLINOIS  
ENVIRONMENTAL PROTECTION AGENCY

IL 532-0357  
ADM 39

Subject Ill. Birmingham Balf Co.  
Data \_\_\_\_\_  
Reviewed by \_\_\_\_\_

Date 10/11/83

Effluent Limits & Monitoring

Out fall 001 - stormwater through  
oil/water sep.  
oil & grease  
suspended solids

Out fall 002 : contact cooling water  
recycle system overflow  
suspended solids  
oil & grease  
pH  
Temp.

note : mass limits are infeasible because  
the mass of pollutants discharged  
cannot be related to the level of  
production. Discharge occurs  
only because of a severe  
rainfall event.

Toxics Monitoring : a) no form 2C was  
submitted  
b) process water  
c) pol toxics present  
(trichloro)



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CK:wn

CC - DWPC/FOS/RU

*DEP/permits*  
*Eps maywood*



Illinois Birmingham + Belt

McKnight rd

OFFICE

WAREHOUSE

oil separator

Manufacturing plant

new discharge

pump room

oil storage area

cell 3

cell 1

cell 2

old discharge now  
oil water



NPDES Permit No. IL0035297

Notice No. dks:sp/8198c

Date: NOV 1 1983

National Pollutant Discharge Elimination System (NPDES)  
Permit Program

PUBLIC NOTICE/FACT SHEET

of

Proposed Reissued NPDES Permit to Discharge into Waters of the State

Public Notice/Fact Sheet Issued By:

Illinois EPA  
Division of Water Pollution Control  
Permit Section  
2200 Churchill Road  
Springfield, Illinois 62706  
217/782-0610

Name and Address of Discharger:

Illinois Birmingham Bolt Company  
P.O. Box 628  
Kankakee, Illinois 60901

Name and Address of Facility:

Illinois Birmingham Bolt Company  
P.O. Box 628  
Kankakee Electrical Steel  
Works Road  
Kankakee, Illinois 60901  
Kankakee County

The Illinois Environmental Protection Agency (IEPA) has made a tentative determination to issue an NPDES permit to discharge into the waters of the state and has prepared a draft permit for the above named discharger.

Length of Permit:

Approximately 5 Years

Name of Receiving Waters:

Unnamed ditch tributary to Soldiers  
Creek

Classification of Receiving Waters:

General Use

The following water quality and effluent standards and limitations were applied to the discharge:

Except as otherwise noted the effluent concentrations and load limitations (including toxics) were based on effluent and, if applicable, water quality limitations specified in Illinois Pollution Control Board (IPCB), Rules and Regulations, Chapter 7, Subtitle C: Water Pollution.

The applicant operates a small rolling mill (SIC 3312). The facility manufactures steel bolts and finished steel products. Plant operation results in a variable discharge volume of process cooling water recycle system overflow from outfall 002, and a variable discharge volume of contaminated stormwater runoff from outfall 001.

Flow will be monitored. The primary parameters to be monitored and limited are Total Suspended Solids, Oil and Grease, pH and Temperature.

Application is made for the existing discharges which are located in Kankakee County, Illinois.

Monitoring frequencies and reporting requirements were established by using the authority set forth in IPCB, Subtitle C: Water Pollution and/or Subtitle D, Mine Related Water Pollution, Title 40, Section 122.11 and 122.62(i) of the federal regulations, and/or using the authority provided in Section 402(a)(1) of the Clean Water Act.

The effluent limitations and special conditions, if applicable, are appended as a part of the draft permit.

Interested persons are invited to submit written comments on the draft permit to the IEPA at the above address. The NPDES permit and notice number(s) must appear on each comment page. Any interested person may submit a written request for a public hearing on the draft permit, stating his or her name and address, the nature of the issues proposed to be raised and the evidence proposed to be presented with regards to those issues.

The application, engineer's review notes including load limit calculations, Public Notice/Fact Sheet, draft permit, comments received, and other documents are available for inspection and may be copied at the IEPA between 9:30 a.m. and 3:30 p.m. Monday through Friday.

All comments on the draft permit and requests for hearing must be received by the IEPA not later than 30 days from the date of this publication. If written comments or requests indicate a significant degree of public interest in the draft permit, the permitting authority may, at its discretion, hold a public hearing. Public notice will be given 30 days before any public hearing. For further information call the Public Notice Clerk at 217/782-0610.

Pursuant to the waiver provisions authorized by 40 CFR 123.6, this proposed permit is within the class, type, and size for which the Regional Administrator, Region V, has waived his right to review, object, or comment on this proposed permit action.

L P C F C O 5 5 C

(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. 09101504

(11) (18)

Kankakee

CO. - L.P.C.

Region # N

Date 07/13/84

(20) (25)

BIRMINGHAM

BIRMINGHAM BOLT

(Location)

(Responsible Party)

Letter Sent (Yes or No)

(26)

Samples Taken: Yes ( ) No (X)

Time: From 10:20am

Weather Clear, 80°

Ground Water ( ) Surface ( ) Other ( )

To 01:45pm

Photos Taken: Yes (X) No ( )

Interviewed E. SUTHERLAND Inspector

(27) (29)

Previous Inspection

Previous Correspondence

Site Open: Yes (X) No ( )

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X)

Landfill ( )

Storage (X)

E.P.A. Permit ( )

Temporarily Closed ( )

Random Dump ( )

Salvage ( )

Variance ( )

Closed Not Covered ( )

Other ( )

A.C.D. ( )

21(e) ( )

Closed and Covered ( )

Quantity Received Daily(1-6)

(30)

Board Order ( )

Illegal (5) (X)

IMPROVED

Apparent Non-

SAME

Compliance (5) ( )

31

DETERIORATED

I S or D

S

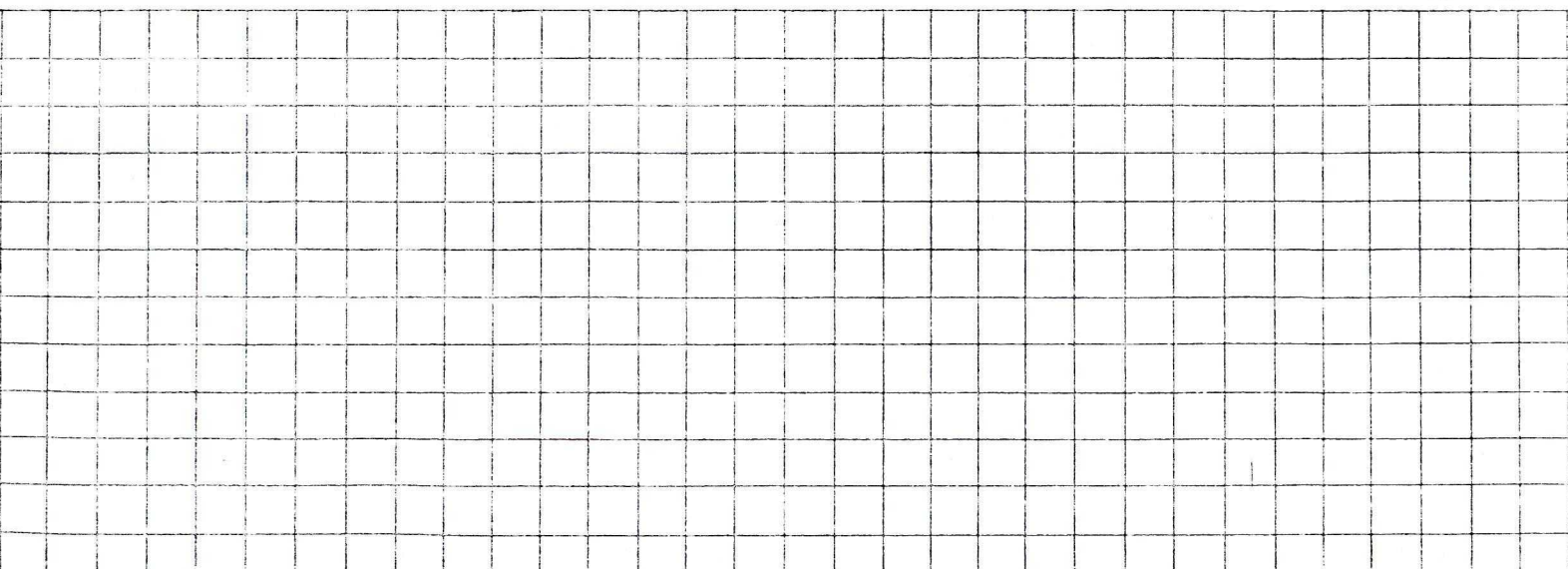
(62)

GENERAL REMARKS: BIRMINGHAM BOLT IS A 3764 MINIDOLL MANUFACTURING  
SMALL ROUNDS AND REPAIRING AND REPAIRING FROM 1980 TO 1984  
REPAIRING AND REPAIRING FROM 1980 TO 1984  
REPAIRING AND REPAIRING FROM 1980 TO 1984  
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INTERVIEW:

DIAGRAM:

36







## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

RECEIVED

AUG 23 1984

1.S.S.  
MEMORANDUMTO: DIVISION FILE IEPA-DLPC DATE: 8/1/84FROM: JAMES WOJCIK ☒ Information onlySUBJECT: 09101504 / KANKAKEE CO. ☐ Response requestedBOURBONNAIS / BIRMINGHAM BOLT

THIS MEMO WILL SUPPLEMENT INFORMATION CONTAINED IN THE JULY 13, 1984 I.S.S. INSPECTION REPORT AND SUBSEQUENT C.I.L.

AS A BRIEF PREFACE, BIRMINGHAM BOLT IS A STEEL MINIMILL MANUFACTURING SMOOTH ROUNDS AND REINFORCING ROD ENTIRELY FROM SCRAP. THE COMPANY IS CURRENTLY STORING APPROXIMATELY 1800 CUBIC YARDS OF BAGHOUSE DUST ON SITE. THE COMPANY WISHES TO GO THROUGH A CLEAN UP AND CLOSURE AND ASSUME GENERATOR RATHER THAN STORAGE STATUS.

ON JULY 10, 1984 I CONTACTED MR. MATTHEW STRAUSS, USEPA HAZARDOUS WASTE IDENTIFICATION BRANCH CHIEF, AND REQUESTED A CLARIFICATION OF THE HAZARDOUS WASTE DESIGNATION OF BAGHOUSE DUST FROM STEEL MINIMILL RECYCLERS. HE INFORMED ME THAT THE WASTE WOULD BE REGULATED AS K061, A LISTED HAZARDOUS WASTE, ALTHOUGH AN ANALYSIS HAS SHOWN IT TO BE HAZARDOUS BY CHARACTERISTIC, EP TOXICITY, D006 AND D008. A COPY OF THE JULY 20, 1984 LETTER TO MR. STRAUSS CONFIRMING OUR CONVERSATION





## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

I.S.S.

## MEMORANDUM

TO: DIVISION FILEDATE: 8/1/84FROM: JAMES WOJCIK☒ Information onlySUBJECT: 09101504/KANKAKEE CO.☐ Response requestedBOURBONNAIS/ BIRMINGHAM BOLT

RECEIVED

AUG 23 1984

IEPA-DLPC

ACCOMPANIES THIS MEMO.

PHIL COOP OF ENVIRONMENTAL AND SAFETY DESIGNS, INC., THE ENGINEERING FIRM CONTRACTED TO HANDLE THE CLEANUP, HAS INFORMED ME THAT A SIMILAR WASTE (D006 AND D008) GENERATED AT A MILL IN ALABAMA WAS NOT REGULATED AS K061. THE BAGHOUSE DUST FROM THAT MILL WAS, IN ADDITION, MIXED WITH SODA ASH IN A PRETREATMENT WHICH, ACCORDING TO MR. COOP, RENDERED IT NON-TOXIC. BIRMINGHAM BOLT WOULD LIKE TO USE THE SODA ASH PRETREATMENT FOR THE DUST CURRENTLY STORED AT THE BOURBONNAIS PLANT AS WELL AS THE DUST GENERATED THERE IN THE FUTURE. IF THE DUST IS REGULATED AS K061 BIRMINGHAM BOLT WILL GO THROUGH THE FORMAL DELISTING PROCEDURE.

THE BAGHOUSE DUST AT THE BOURBONNAIS MILL IS HANDLED IN THE FOLLOWING MANNER: A COVERED 20 CUBIC YARD ROLL-OFF BOX, SUPPLIED BY KANKAKEE INDUSTRIAL DISPOSAL (ILD054155080, SWH #0066) IS USED TO COLLECT DUST AT THE BAGHOUSE. A FEW HUNDRED YARDS NORTH IS A LARGE PILE OF DIRT INTO WHICH A HOLE HAS BEEN EXCAVATED.





## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

2.S.S.

MEMORANDUM

TO: DIVISION FILEDATE: 8/1/84FROM: JAMES WOJCIK☒ Information onlySUBJECT: 09101504/KANKAKEE CO.☐ Response requestedBOURBONNAIS/BIRMINGHAM BOLT

AFTER THE COLLECTED DUST, ROLL-OFF BOX AND TRUCK ARE WEIGHED, THE DUST IS DUMPED INTO THE EXCAVATION. BEFORE RETURNING THE ROLL-OFF TO THE BAG HOUSE, THE TRUCK AND ROLL-OFF ARE AGAIN WEIGHED AND THE NET QUANTITY OF DUST AND THE DATE ARE RECORDED IN A LOG. NO COVER IS APPLIED UNTIL THE HOLE IS FILLED AT WHICH TIME THE STORED DUST RECEIVES A SOIL "CAP." SINCE 1981, 3 SUCH EXCAVATIONS HAVE BEEN FILLED AND COVERED AND A 4<sup>th</sup> IS IN ACTIVE USE. THE DUST IS PROTECTED FROM THE WIND WHILE THE ACTIVE CELL IS OPEN BUT NOT FROM DIRECT PRECIPITATION OR RUN-ON. NO ALTERNATE AREA HAS BEEN DESIGNATED FOR BAD WEATHER USE AND NO MONITOR WELLS ARE ON SITE.

RECEIVED

AUG 23 1984

IEPA-DLPC



L P C F C O 5 5 C  
(1) (8) (9)

OBSERVATION REPORT - SITE INVENTORY NO. 09101504

KANKAKEE

CO. - L.P.C.

Region # N

Date 07/13/84

BOURBONNAIS

BIRMINGHAM BOLT

(Location)

(Responsible Party)

Letter Sent (Yes or No) Yes

Samples Taken: Yes ( ) No (X)

Time: From 10:20am

Weather CLEAR, 80°F

Ground Water ( ) Surface ( ) Other ( )

To 01:45pm

Photos Taken: Yes (X) No ( )

Interviewed E. SARTORI, et al. Inspector J J W

Previous Inspection

Previous Correspondence

Site Open: Yes (X) No ( )

OPERATIONAL STATUS:

TYPE OF OPERATION:

AUTHORIZATION:

Operating (X)

Landfill ( )

Storage (X)

E.P.A. Permit ( )

Temporarily Closed ( )

Random Dump ( )

Salvage ( )

Variance ( )

Closed Not Covered ( )

Other ( )

A.C.D. ( )

21(e) ( )

Closed and Covered ( )

Quantity Received Daily(1-6)

(30)

Board Order ( )

Illegal (5) (X)

IMPROVED

SAME

Apparent Non-Compliance (5) ( )

5  
31

DETERIORATED

I S or D

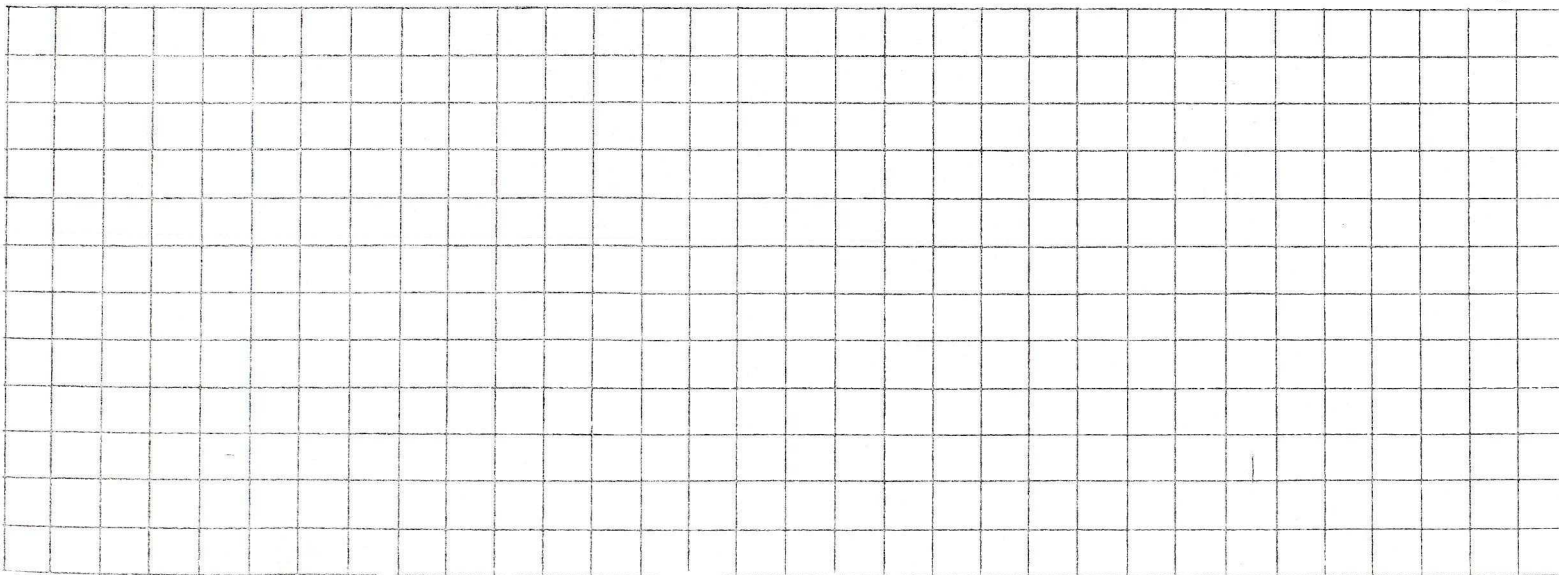
S  
(62)

GENERAL REMARKS: BIRMINGHAM BOLT IS A STEEL MINIMILL MANUFACTURING SMOOTH ROUNDS AND REINFORCING ROD ENTIRELY FROM STEEL SCRAP. APPROXIMATELY 1800 CUBIC YARDS OF KOGI BAGHOUSE DUST IS BEING STORED ON SITE IN 4 WASTE PILES. THE COMPANY IS A NOT-NOTIFIED NON-FILER. VIOLATIONS AT THE TIME OF THE INSPECTION WERE: 35 ILL. ADM. CODE 700.105, 725.111, 725.115, 725.116, 725.152, 725.172, 725.175, 725.212 AND 725.353.

INTERVIEW:

DIAGRAM:

88





**INDUSTRIAL DISPOSAL SERVICE YOU CAN DEPEND ON**

KANKAKEE INDUSTRIAL DISPOSAL, INC. • P.O. BOX 742 • 1360 EAST LOCUST ST. KANKAKEE, ILLINOIS 60901  
GARAGE 933-2931 MOBIL PHONE 933-1777 CAR 17 OFFICE 933-3961

November 2, 1981

**RECEIVED**

NOV 04 1981

U.S. EPA Compliance Section  
Water & Hazardous Materials  
Enforcement Branch  
Mr. Arnold Leder, Chief  
230 South Dearborn St.  
Chicago, Illinois 60604

**ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS**

Dear Mr. Leder;

Enclosed is a cover letter from Waste Management (William Karpas) to the Illinois EPA for four (4) permit applications per 89 drums of waste at Illinois Birmingham Bolt, Peotone, Ill.

I sent a followup letter on this to Rama Chaturvedi, Manager, with the Illinois EPA at Springfield requesting an emergency permit. I have not had a reply to my request as of this date.

I will keep you advised on this matter.

Very Truly Yours,

Howard L. Kinneman

cc: Ken Bechely, IEPA  
J. Offerman, Birmingham Bolt



Chemical Waste Management of Illinois, Inc.  
P.O. Box 1296  
Calumet City, Illinois 60409  
312/891-1500

October 19, 1981

RECEIVED

NOV 04 1981

ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

Mr. Wally El-Beck  
Illinois E.P.A.  
Land/Noise Pollution Control  
Permit Section  
2200 Churchill Road  
Springfield, IL 62706

Dear Wally:

Enclosed please find four (4) separate disposal permit applications for eighty-nine (89) abandoned drums containing hazardous wastes from Illinois Birmingham Bolt's plant in Kankakee, Illinois. Per Hak Cho (U.S.E.P.A.), Arnold Leder (U.S.E.P.A.), and Ken Bechely (I.E.P.A.), Kankakee Industrial Disposal, Inc. will be listed as the generator since they have a Federal I.D. number as a generator of hazardous waste; whereas Illinois Birmingham Bolt does not have a Federal I.D. number. They just recently moved into their Kankakee facility and found that these drums were left there by the former occupant. Also, Kankakee Industrial Disposal has assured me that prior to shipment, any damaged drum will be packaged in an "overpack".

The attached fingerprint analyses were performed by Kankakee Industrial Disposal and Chemical Waste Management of Illinois. Per these analyses, the drums were divided into four (4) groups. Group "A" consists of thirty-seven (37) drums of flammable paint and resin wastes (D001). Group "B" consists of thirty-five (35) drums of non-flammable water-based or oil-based paint sludges, solidified resins, and empties (D007 and D008 were assigned in lieu of performing extensive analyses). Group "C" consists of three (3) drums of liquid caustic wastes (D002). Group "D" consists of fourteen (14) drums of liquid acid wastes (D002). I feel that Chemical Waste Management of Illinois can safely dispose of these drums via the following disposal methods: Group "A" - 05 at ESL, Group "B" - 07 at ESL, Group "C" - 07 at ESL, and Group "D" - 15/04 at CID.

Thank you very much for your cooperation in this matter. If you should have any questions, please feel free to contact me.

Sincerely,

Chemical Waste Management of Illinois  
*William R. Karpas*  
William R. Karpas  
Technical Manager, Laboratory Services

WRK/sfk

Encl:

cc: Tom Tomaszewski, CWM1  
Gary Coker, CWM1  
Kirk Stemple, ESL  
✓ Howard Kinneman, KID



RECEIVED

October 22, 1981

001271991

Illinois Environmental Protection Agency  
Rama K. Chaturvedi, Manager  
Division of Land/Noise Pollution Control  
2200 Churchill Road  
Springfield, Ill. 62706

ILL. E.P.A. - D.L.P.C.  
STATE OF ILLINOIS

Dear Mr. Chaturvedi;

This is in reference to an application of permit for Birmingham Bolt of Peotone to dispose of drum material that was left on the property by previous owner.

Mr. Arnold Leder of the U.S. EPA and Mr. Ken Beechley from the Illinois EPA are aware of the work done so far in preparing to clean up and dispose of said drums by us, ( KID, Inc. ). I have been in contact with these people, keeping them informed.

I would like to request an emergency special permit to remove these drums because of the hazards involved. These drums are not inclosed by any means. They are not around any homes or buildings but are in a field approximately 75 to 100 yards from the plant. Not being enclosed does pose as a hazard because of the acids and flammables that the drums contain. Thank you for your consideration on this matter.

Very Truly Yours,



Howard Kinneman

cc: Mr. Arnold Leder - USEPA  
Mr. Ken Beechley - ILLEPA  
Mr. J. Offerman - Birmingham Bolt

SEP 24 1981

5EVIHME

CERTIFIED MAIL  
RETURN RECEIPT REQUESTED

Mr. Howard Kinneman  
Kankakee Industrial Disposal  
P.O. Box 742  
Kankakee, Illinois 60901

RECEIVED

OCT 02 1981

ILL. EPA. - D.L.P.C.  
STATE OF ILLINOIS

Dear Mr. Kinneman:

Thank you for your letter of September 4, 1981 and the waste analysis from the Birmingham Bolt facility.

As you are aware, the Birmingham Bolt Company is currently in noncompliance with numerous requirements of the Resource Conservation Recovery Act. In view of this, please provide me with your plans which will accomplish removing the hazardous wastes from the Birmingham Bolt Company property to permitted hazardous waste facilities within 30 days of receipt of this letter. You are further advised that failure to remove the wastes in the 30 day time frame may result in the initiation of Federal enforcement in this matter.

Please contact me if you have any questions at 353-2114.

Sincerely yours,

Original Signed by: Arnold E. Leder

Arnold E. Leder, Chief  
Compliance Section  
Water & Hazardous Materials  
Enforcement Branch

cc: Ken Boechley  
Illinois Environmental Protection Agency

Jerry Offerman, Plant Manager  
Birmingham Bolt



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO: DIVISION FILE DATE: 8/1/84

FROM: JAMES NOZICK ☒ Information only

SUBJECT: 09101502 / KANKAKEE CO. ☐ Response requested  
BOURBONNAIS / BIRMINGHAM BOLT

THIS MEMO WILL SUPPLEMENT INFORMATION CONTAINED IN THE JULY 13, 1984 I.S.S. INSPECTION REPORT AND SUBSEQUENT C.I.L.

AS A BRIEF PREFACE, BIRMINGHAM BOLT IS A STEEL MINIMILL MANUFACTURING SMOOTH ROUNDS AND REINFORCING ROD ENTIRELY FROM SCRAP. THE COMPANY IS CURRENTLY STORING APPROXIMATELY 1800 CUBIC YARDS OF BAGHOUSE DUST ON SITE. THE COMPANY WISHES TO GO THROUGH A CLEAN UP AND CLOSURE AND ASSUME GENERATOR RATHER THAN STORAGE STATUS.

ON JULY 10, 1984 I CONTACTED MR. MATTHEW STRAUSS, USEPA HAZARDOUS WASTE IDENTIFICATION BRANCH CHIEF, AND REQUESTED A CLARIFICATION OF THE HAZARDOUS WASTE DESIGNATION OF BAGHOUSE DUST FROM STEEL MINIMILL RECYCLERS. HE INFORMED ME THAT THE WASTE WOULD BE REGULATED AS K061, A LISTED HAZARDOUS WASTE, ALTHOUGH AN ANALYSIS HAS SHOWN IT TO BE HAZARDOUS BY CHARACTERISTIC, EP TOXICITY, D006 AND D008. A COPY OF THE JULY 20, 1984 LETTER TO MR. STRAUSS CONFIRMING OUR CONVERSATION





## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO: DIVISION FILE DATE: 8/1/84

FROM: JAMES WOJCIK ☒ Information only

SUBJECT: 09101504/KANKAKEE CO ☐ Response requested  
BOURBONNAIS/BIRMINGHAM BOLT  
2021382 NT

ACCOMPANIES THIS MEMO.

PHIL COOP OF ENVIRONMENTAL AND SAFETY DESIGNS, INC., THE ENGINEERING FIRM CONTRACTED TO HANDLE THE CLEANUP, HAS INFORMED ME THAT A SIMILAR WASTE (D006 AND D008) GENERATED AT A MILL IN ALABAMA WAS NOT REGULATED AS K061. THE BAGHOUSE DUST FROM THAT MILL WAS, IN ADDITION, MIXED WITH SODA ASH IN A PRETREATMENT WHICH, ACCORDING TO MR. COOP, RENDERED IT NON-TOXIC. BIRMINGHAM BOLT WOULD LIKE TO USE THE SODA ASH PRETREATMENT FOR THE DUST CURRENTLY STORED AT THE BOURBONNAIS PLANT AS WELL AS THE DUST GENERATED THERE IN THE FUTURE. IF THE DUST IS REGULATED AS K061 BIRMINGHAM BOLT WILL GO THROUGH THE FORMAL DELISTING PROCEDURE.

THE BAGHOUSE DUST AT THE BOURBONNAIS MILL IS HANDLED IN THE FOLLOWING MANNER: A COVERED 20 CUBIC YARD ROLL-OFF BOX, SUPPLIED BY KANKAKEE INDUSTRIAL DISPOSAL (ILD054155080, SWH #0066) IS USED TO COLLECT DUST AT THE BAGHOUSE. A FEW HUNDRED YARDS NORTH IS A LARGE PILE OF DIRT INTO WHICH A HOLE HAS BEEN EXCAVATED.



## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

MEMORANDUM

TO: DIVISION FILE DATE: 8/1/84  
FROM: JAMES WOJCIK ☒ Information only  
SUBJECT: 09101504/KANKAKEE CO. ☐ Response requested  
BOURBONNAIS/BIRMINGHAM BOLT  
2001302077

AFTER THE COLLECTED DUST, ROLL-OFF BOX AND TRUCK ARE WEIGHED, THE DUST IS DUMPED INTO THE EXCAVATION. BEFORE RETURNING THE ROLL-OFF TO THE BAG HOUSE THE TRUCK AND ROLL-OFF ARE AGAIN WEIGHED AND THE NET QUANTITY OF DUST AND THE DATE ARE RECORDED IN A LOG. NO COVER IS APPLIED UNTIL THE HOLE IS FILLED AT WHICH TIME THE STORED DUST RECEIVES A SOIL "CAP." SINCE 1981, 3 SUCH EXCAVATIONS HAVE BEEN FILLED AND COVERED AND A 4<sup>TH</sup> IS IN ACTIVE USE. THE DUST IS PROTECTED FROM THE WIND WHILE THE ACTIVE CELL IS OPEN BUT NOT FROM DIRECT PRECIPITATION OR RUN-ON. NO ALTERNATE AREA HAS BEEN DESIGNATED FOR BAD WEATHER USE AND NO MONITOR WELLS ARE ON SITE.





# Environmental Protection Agency

1701 First Avenue, Maywood, IL. 60153

312/345-9780

CERTIFIED MAIL

Return Receipt  
#P 272 959 936

Refer to: 09101504 - Kankakee County - Bourbonnais/Birmingham Bolt  
Compliance Inquiry Letter

August 20, 1984

Mr. Eugene Sartori  
Birmingham Bolt Steel Company  
P.O. Box 628  
Kankakee, Illinois 60901

Dear Mr. Sartori:

A July 13, 1984 inspection of your site revealed apparent violations of the Illinois Environmental Protection Act and/or violations of the Rules and Regulations of the Illinois Pollution Control Board. The purpose of this letter is to inquire as to your position with respect to the validity of the Agency findings and also your plans to correct the apparent violations. For your convenience, we are enclosing with this letter a copy of the inspection report. The apparent violations noted in our inspection are as follows:

The owner/operator has not provided notification in accordance with Section 3010 of the Resource Conservation and Recovery Act for this facility. The facility is a hazardous waste generator and storage facility, as defined by 35 Ill. Adm. Code 720.110.

No Part A permit application for the facility has been filed with the USEPA as required by 35 Ill. Adm. Code 700.105(a)(2).

The owner/operator must have a contingency plan at the facility. The contingency plan must address the actions to be taken by facility personnel in response to fires, explosions, or any unplanned release of hazardous waste or hazardous constituents to the environment. The plan must describe the arrangements agreed to by local police, fire departments, hospitals and emergency response teams. The names, addresses, and phone numbers of all persons qualified to act as emergency coordinators must be included in the plan. The contingency plan must list all emergency equipment at the facility, including the location, a physical description, and a brief summary of the capabilities of each item on the list. In facilities where evacuation could be necessary a plan describing

PAGE 2  
is Missing

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- 5) Records and results of inspections.
- 6) Monitoring and testing data.
- 7) All closure cost estimates and for disposal facilities all post-closure cost estimates.

You are in apparent violation of 35 Ill. Adm. Code 725.173 for the following reasons: no closure cost estimate was documented.

Pursuant to 35 Ill. Adm. Code 725.353, if the leachate or run-off from a pile is a hazardous waste, the pile must be on an impermeable base and the leachate and run-off managed as a hazardous waste or the pile must be protected from precipitation and no free liquids be placed in the pile. You are in apparent violation of 35 Ill. Adm. Code 725.353 for the following reasons: the pile was not protected from precipitation and run-on.

Pursuant to 35 Ill. Adm. Code 725.115(b) the owner/operator is to establish and maintain inspection records and schedules which detail records of malfunctions, operator errors, discharges, safety and emergency equipment, security devices, and operating and structural devices. You are in apparent violation of 35 Ill. Adm. Code 725.115(b) for the following reasons: records of safety equipment, emergency equipment and security devices was not documented.

Pursuant to 35 Ill. Adm. Code 725.175 the owner or operator must prepare and submit a single copy of an annual report to the Director by March 1 of each year. The annual report must cover facility activities during the previous calendar year. You are in apparent violation for the following reason: no annual reports have been submitted.

Please submit in writing, within fifteen (15) calendar days of the date of this letter, the reasons for the apparent violations outlined above, as well as a description of the steps you have instituted to prevent any further recurrence of the above-cited violations. The written response should be sent to the following address:

Mr. Kenneth P. Bechely, Northern Region Manager  
Illinois Environmental Protection Agency  
Division of Land Pollution Control  
1701 So. First Avenue - Suite 600  
Maywood, Illinois 60153

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109101504  
STATE IDENTIFICATION NUMBER  
(If Applicable)

NON-NOTIFIER  
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: BIRMINGHAM BOLT STEEL CO., ILL. DIV.  
(B) Street: ROUTE 50 & MCKNIGHT ROAD  
(C) City: BOURBONNAIS (D) State: IL. (E) Zip Code: 60914  
(F) Phone: 815/937-3131 (G) County: KANKAKEE  
(H) Operator: BIRMINGHAM BOLT STEEL CO., ILL. DIV.  
(I) Street: P.O. BOX 628  
(J) City: KANKAKEE (K) State: IL (L) Zip Code: 60901  
(M) Phone: 815/937-3131 (N) County: KANKAKEE  
(O) Owner: ALABAMA BIRMINGHAM BOLT CO.  
(P) Street: P.O. BOX 1208  
(Q) City: BIRMINGHAM (R) State: AL (S) Zip Code: 35201  
(T) Phone: 205/871-9290 (U) County: JEFFERSON  
(V) Date of Inspection: 7/13/84 (W) Time of Inspection (From) 10:20a (To) 1:45p  
(X) Weather Conditions: CLEAR, 80°F

PAGES 10, 11, 13-18, 21 & 23 ARE NOT APPLICABLE  
AND HAVE BEEN REMOVED

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Rev. 3-6-81/J.B.



(Y) Person(s) Interviewed

Title

Telephone

MR. THOMAS KERLIN

V.P./STEEL PRODUCTION 205/252-8777

MR. EUGENE SARTORI

GENERAL MANAGER 815/937-3131

MR. PHILLIP COOP

HAZARDOUS WASTE SPEC. 901/372-7962

(Z) Inspection Participants

Agency/Title

Telephone

MR. CHARLES GRUNTMAN

IEPA/PROT. ENG.

312/345-9780

MR. JAMES WOJCIK

IEPA/PROT. SPEC

312/345-9780

(AA) Preparer Information

Name

Agency/Title

Telephone

JAMES WOJCIK

IEPA/PROT. SPEC

312/345-9780

## II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- L A. Storage and/or Treatment
1. Containers (I)
  2. Tanks (J)
  3. Surface Impoundments (K)
  4. Waste Piles (L)

   B. Land Treatment (M)

   C. Landfills (N)

   D. Incineration and/or Thermal Treatment (O and P)

   E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

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### III. GENERAL FACILITY STANDARDS: (Part 265 Subpart B)

Yes	No	NI*	Remark
-----	----	-----	--------

- (A) Has the Regional Administrator been notified regarding:

1. Receipt of hazardous waste from a foreign source?

           X N/A

- ## 2. Facility expansion?

\_\_\_\_\_ X N/A

- (B) General Waste Analysis:

1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?

X \_\_\_\_\_

2. Does the owner or operator have a detailed waste analysis plan on file at the facility?

X \_\_\_\_\_

3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?

N/A ON-SITE

- (C) Security - Do security measures include:  
(if applicable)

1. 24-Hour surveillance?

X GUARD SERVICE

2. Artificial or natural barrier around facility?

7      FENCE

3. Controlled entry?

X      \_\_\_\_\_

4. Danger sign(s) at entrance?

X \_\_\_\_\_

- (D) Do Owner or Operator Inspections Include:

1. Records of malfunctions?

X \_\_\_\_\_ EQUIPMENT ONLY

2. Records of operator error?

X      \_\_\_\_\_

3. Records of discharges?

X — — — RECORDS FOR DAY HOWE  
EQUIPMENT; NO

DISCHARGE FROM  
WASTE PILE

\*Not Inspected

3

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### III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<u>X</u>	---	---	<u>BAG HOUSE SCHEDULED; NO DOCUMENTS FOR WASTE FILE</u>
5. Safety, emergency equipment?	---	<u>X</u>	---	<u>NOT DOCUMENTED</u>
6. Security devices?	---	<u>X</u>	---	<u>"</u>
7. Operating and structural devices?	<u>X</u>	---	---	<u>FOR BAG HOUSE RECORDS ONLY; NO DOCUMENTS FOR WASTE FILE</u>
8. Inspection log?	<u>X</u>	---	---	<u>LOG IS NOT CURRENTLY USED</u>
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	---	<u>X</u>	---	<u>NOT DOCUMENTED</u>
2. Job descriptions?	---	<u>X</u>	---	<u>"</u>
3. Description of training?	---	<u>X</u>	---	<u>"</u>
4. Records of training?	---	<u>X</u>	---	<u>"</u>
5. Have facility personnel received required training by 5-19-81?	---	<u>X</u>	---	<u>"</u>
6. Do new personnel receive required training within six months?	<u>X</u>	---	---	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	---	---	<u>X</u>	<u>N/A</u>
2. No smoking signs?	---	---	<u>X</u>	<u>"</u>
3. Separation and protection from ignition sources?	---	---	<u>X</u>	<u>"</u>

\*Not Inspected

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IV. PREPAREDNESS AND PREVENTION:  
(Part 265 Subpart C)

(A) Maintenance and Operation  
of Facility:

Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

Yes No NI\* Remarks

     X     

(B) If required, does the facility  
have the following equipment:

1. Internal communications or  
alarm systems?

X          

TELEPHONE

2. Telephone or 2-way radios  
at the scene of operations?

X          

  "

3. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

X          

END LOADER & SHOVELS

Indicate the volume of water and/or foam available for fire control:

WASTE IS NONFLAMMABLE BAG HOUSE DUST

(C) Testing and Maintenance of  
Emergency Equipment:

1. Has the owner or operator  
established testing and  
maintenance procedures  
for emergency equipment?

X          

2. Is emergency equipment  
maintained in operable  
conditions?

X          

(D) Has owner or operator provided  
immediate access to internal  
alarms? (if needed)

X          

TELEPHONE

\*Not Inspected

5

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(E) Is there adequate aisle space for unobstructed movement?

\_\_\_\_\_ X \_\_\_\_\_ N/A \_\_\_\_\_

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:  
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI\* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Countermeasures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X

2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X

ARRANGEMENTS WITH K.I.D., THE CONTRACTOR, FOR MOVEMENT TO STORAGE AREA; BECAUSE OF NATURE OF WASTE, OTHER ORGANIZATIONS NEED NOT BE NOTIFIED.

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

X

LOCATION OF EQUIPMENT NOT IDENTIFIED

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

\_\_\_\_\_

X

N/A

\*Not Inspected

6

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# V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<u>X</u>	<u>    </u>	<u>    </u>	<u>ON SITE - NOT CURRENTLY NEEDED AT LOCAL EMERGENCY ORGANIZATIONS</u>
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<u>X</u>	<u>    </u>	<u>    </u>	<u>GENE SARTORI or CARROL UTLEY</u>
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<u>    </u>	<u>    </u>	<u>X</u>	<u>NO OCCURRENCE</u>

## VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<u>    </u>	<u>    </u>	<u>N/A</u>	<u>NO WASTE SHIPPED OFF SITE</u>
2. Are records of past shipments retained for 3 years?	<u>    </u>	<u>    </u>	<u>N/A</u>	<u>"</u>
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<u>    </u>	<u>    </u>	<u>N/A</u>	<u>"</u>

\*Not Inspected



# VI. RECORDKEEPING - Continued

## (C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

X — — —

RECORD IS IN ROUGH  
FORM; NOT YET  
ASSEMBLED AS A SINGLE  
DOCUMENT

2. Does the operating record contain the following information:

- \*\*b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

X — — —

DATES K.I.D. MOVED  
WASTE FROM BAG HOUSE  
TO PILE

- c. The location and quantity of each hazardous waste within the facility?

X — — —

QUANTITIES ARE  
VOLUME ESTIMATES

- \*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — — X

N/A

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X — — —

WASTE ANALYSES AND  
INSPECTIONS OF BAG  
HOUSE ONLY

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

— — — X

NONE REQUIRED

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

— — — X

NO DOCUMENTED  
CLOSURE PLAN

\*\* See page 33252 of the May 19, 1980, Federal Register.

\*\*\* Only applies to disposal facilities



VII. CLOSURE AND POST CLOSURE  
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<u>  </u>	<u>  X  </u>	<u>  </u>	
2. Has this plan been submitted to the Regional Administrator	<u>  </u>	<u>  X  </u>	<u>  </u>	<u>CLOSURE HAS NOT</u> <u>BEGUN</u>
3. Has closure begun?	<u>  </u>	<u>  X  </u>	<u>  </u>	
4. Is closure estimate available by May 19, 1981?	<u>  </u>	<u>  X  </u>	<u>  </u>	
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				<u>  </u> <u>  </u> <u>  X  </u> <u>  </u>

VIII. FACILITY STANDARDS  
(Part 265, Subparts I thru R)

I  
USE AND MANAGEMENT OF CONTAINERS

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
				<u>NO CONTAINERS;</u>
1. Are containers in good condition?	<u>  </u>	<u>  </u>	<u>  X  </u>	
2. Are containers compatible with waste in them?	<u>  </u>	<u>  </u>	<u>  X  </u>	<u>  "</u>
3. Are containers stored closed?	<u>  </u>	<u>  </u>	<u>  X  </u>	<u>  "</u>
4. Are containers managed to prevent leaks?	<u>  </u>	<u>  </u>	<u>  X  </u>	<u>  "</u>
5. Are containers inspected weekly for leaks and defects?	<u>  </u>	<u>  </u>	<u>  X  </u>	<u>  "</u>
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<u>  </u>	<u>  </u>	<u>  X  </u>	<u>  "</u>

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L

## WASTE PILES

Facility Name: BIRMINGHAM BOLTDate of Inspection: 7/13/84

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	<u>X</u>	<u>---</u>	<u>---</u>	<u>WASTE IS PLACED INTO A HOLE EXCAVATED OUT OF A MOUND OF DIRT</u>
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>SINGLE WASTE STREAM</u>
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	<u>---</u>	<u>X</u>	<u>---</u>	<u>NO PROTECTION FROM DIRECT PRECIPITATION OR RUN-ON IN ACTIVE AREA</u>
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>NON REACTIVE &amp; NON IGNITABLE</u>
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>"</u>
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>NO INCOMPATIBLE WASTES</u>
7. Are piles of incompatible waste protected by barriers or distance from other waste?	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>"</u>

\*Not Inspected

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	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	___	___	<u>N/A</u>	<u>NO CHEMICAL, PHYSICAL OR BIOLOGICAL TREATMENT</u>
4. Are inspection procedures followed according to 265.403?	___	___	<u>N/A</u>	<u>"</u>
5. Are the special requirements fulfilled for ignitable or reactive wastes?	___	___	<u>N/A</u>	<u>"</u>
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	___	___	<u>N/A</u>	<u>"</u>

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

#### IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

#### 1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	___	___	<u>X</u>	<u>ALL WASTE CURRENTLY ON-SITE</u>
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)	RECEIVED AUG 23 1984 IEPA-DLPC			<u>"</u>
1. Manifest document number?	___	___	<u>X</u>	___
2. Name, mailing address, telephone number, and EPA ID Number of Generator	___	___	<u>X</u>	<u>"</u>



	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	—	—	<u>X</u>	<i>ALL WASTE CURRENTLY ON-SITE</i>
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	—	—	<u>X</u>	<i>"</i>
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	—	—	<u>X</u>	<i>"</i>
6. The total quantity of waste(s) and the type and number of containers loaded?	—	—	<u>X</u>	<i>"</i>
7. Required certification?	—	—	<u>X</u>	<i>"</i>
8. Required signatures?	—	—	<u>X</u>	<i>"</i>
(C) Does the owner or operator submit exception reports when needed?	—	—	<u>X</u>	<i>"</i>

## 2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	—	—	<u>X</u>	<i>ALL WASTE CURRENTLY ON SITE AS WASTEPILE</i>
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	—	—	<u>X</u>	<i>"</i>
(C) If required, are placards available to transporters of hazardous waste?	—	—	<u>X</u>	<i>"</i>

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VI. RECORDKEEPING and REPORTING  
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	___	<u>X</u>	___	<u>ALL WASTE CURRENTLY ON-SITE; ANALYSES AVAILABLE; NO ANNUAL REPORTS</u>
(B) Has the generator submitted Annual Reports and Exception Reports as required?	___	<u>X</u>	___	<u>NO ANNUAL REPORTS</u>

VII. INTERNATIONAL SHIPMENTS  
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?	___	<u>X</u>	___	___

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	___	___	<u>N/A</u>	<u>NO EXPORTS</u>
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	___	___	<u>N/A</u>	<u>"</u>
c. Met the Manifest requirements?	___	___	<u>N/A</u>	<u>"</u>
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	___	___	<u>N/A</u>	<u>NO IMPORTS</u>

\*Not Inspected

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## REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

At the time of the inspection normal operations were stopped for annual vacations and maintenance. During normal operations approximately 20 tons of molten steel are produced every 2 hours from each of 2 electric arc furnaces. The facility manufactures smooth rounds and #4 to #11 reinforcing rod from steel scrap. Total annual production is approximately 100,000 tons.

Since 1981 the company has stored baghouse dust in on-site waste piles. Storage is above grade using a large pile of soil into which cells have been excavated. 3 such cells are now filled and according to Gene Sartori total waste stored is approximately 1800 cubic yards. The dust is captured in a 20 yard roll-off box at the baghouse and transported by Kankakee Industrial Disposal to the storage area. The 4th, and only active cell, is protected from wind but not from direct precipitation or run-on. No cover is applied until the cell is filled at which time a soil "cap" is provided. No alternate area has been designated for bad weather and no monitor wells are on site. The dust has been analyzed and is EP Toxic for cadmium (D006) and lead (D008).

Apparent violations at the time of the inspection are: 35 Ill. Adm. Code 700.105, 725.111, 725.115, 725.116, 725.152, 725.173, 725.175, 725.212 and 725.353.

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09101504  
STATE IDENTIFICATION NUMBER  
(If Applicable)

NON-NOTIFIER  
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: BIRMINGHAM BOLT STEEL CO., ILL. DIV.  
(B) Street: ROUTE 50 & MCKNIGHT ROAD  
(C) City: BOURBONNAIS (D) State: IL (E) Zip Code: 60914  
(F) Phone: 815/937-3131 (G) County: KANKAKEE  
(H) Operator: BIRMINGHAM BOLT STEEL CO., ILL. DIV.  
(I) Street: P.O. Box 628  
(J) City: KANKAKEE (K) State: IL (L) Zip Code: 60901  
(M) Phone: 815/937-3131 (N) County: KANKAKEE  
(O) Owner: ALABAMA BIRMINGHAM BOLT CO.  
(P) Street: P.O. Box 1208  
(Q) City: BIRMINGHAM (R) State: AL (S) Zip Code: 35201  
(T) Phone: 205/871-9290 (U) County: JEFFERSON  
(V) Date of Inspection: 7/13/84 (W) Time of Inspection (From) 10:20a (To) 1:45p  
(X) Weather Conditions: CLEAR, 80°F

PAGES 10, 11, 13-18, 21 & 23 ARE NOT APPLICABLE  
AND HAVE BEEN REMOVED

Rev. 3-6-81/J.B.

(Y) Person(s) Interviewed

Title

Telephone

MR. THOMAS KERLIN VP. STEEL PRODUCTION 205/252-8777

MR. EUGENE SARTORI GENERAL MANAGER 815/937-3131

MR. PHILLIP COOP HAZARDOUS WASTE SPEC. 901/372-7962

(Z) Inspection Participants

Agency/Title

Telephone

MR. CHARLES GRUNTMAN IEPA/PROT. ENG. 312/345-9780

MR. JAMES WOJCIK IEPA/PROT. SPEC 312/345-9780

(AA) Preparer Information

Name

Agency/Title

Telephone

JAMES WOJCIK IEPA/PROT. SPEC 312/345-9780

## II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- A. Storage and/or Treatment
1. Containers (I)
  2. Tanks (J)
  3. Surface Impoundments (K)
  4. Waste Piles (L)
- B. Land Treatment (M)
- C. Landfills (N)
- D. Incineration and/or Thermal Treatment (O and P)
- E. Chemical, Physical, and Biological Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.



III. GENERAL FACILITY STANDARDS:  
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<u>    </u>	<u>    </u>	<u>X</u>	<u>N/A</u>
2. Facility expansion?	<u>    </u>	<u>    </u>	<u>X</u>	<u>N/A</u>
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>    </u>	<u>    </u>	<u>N/A</u>	<u>ALL WASTE CURRENTLY ON-SITE</u>
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<u>X</u>	<u>    </u>	<u>    </u>	<u>GUARD SERVICE</u>
2. Artificial or natural barrier around facility?	<u>X</u>	<u>    </u>	<u>    </u>	<u>FENCE</u>
3. Controlled entry?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>
4. Danger sign(s) at entrance?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>
(D) Do Owner or Operator Inspections Include:				<u>RECORDS FOR BAG HOUSE EQUIPMENT ONLY</u>
1. Records of malfunctions?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>
2. Records of operator error?	<u>X</u>	<u>    </u>	<u>    </u>	<u>    </u>
3. Records of discharges?	<u>X</u>	<u>    </u>	<u>    </u>	<u>RECORDS FOR BAG HOUSE EQUIPMENT; NO DISCHARGE FROM WASTE PILE</u>

\*Not Inspected

### III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<u>X</u>	<u>---</u>	<u>---</u>	BAG HOUSE SCHEDULED; NO DOCUMENTS FOR WASTE PILE
5. Safety, emergency equipment?	<u>---</u>	<u>X</u>	<u>---</u>	NOT DOCUMENTED "
6. Security devices?	<u>---</u>	<u>X</u>	<u>---</u>	FOR BAG HOUSE RECORDS ONLY; NO DOCUMENTS
7. Operating and structural devices?	<u>X</u>	<u>---</u>	<u>---</u>	FOR WASTE PILE LOG IS NOT CURRENTLY USED
8. Inspection log?	<u>X</u>	<u>---</u>	<u>---</u>	
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<u>---</u>	<u>X</u>	<u>---</u>	NOT DOCUMENTED
2. Job descriptions?	<u>---</u>	<u>X</u>	<u>---</u>	"
3. Description of training?	<u>---</u>	<u>X</u>	<u>---</u>	"
4. Records of training?	<u>---</u>	<u>X</u>	<u>---</u>	"
5. Have facility personnel received required training by 5-19-81?	<u>---</u>	<u>X</u>	<u>---</u>	"
6. Do new personnel receive required training within six months?	<u>X</u>	<u>---</u>	<u>---</u>	
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<u>---</u>	<u>---</u>	<u>X</u>	N/A
2. No smoking signs?	<u>---</u>	<u>---</u>	<u>X</u>	"
3. Separation and protection from ignition sources?	<u>---</u>	<u>---</u>	<u>X</u>	"

\*Not Inspected



IV. PREPAREDNESS AND PREVENTION:  
(Part 265 Subpart C)

(A) Maintenance and Operation  
of Facility:

Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

Yes No NI\* Remarks

— X —

(B) If required, does the facility  
have the following equipment:

1. Internal communications or  
alarm systems?

X — —

TELEPHONE

2. Telephone or 2-way radios  
at the scene of operations?

X — —

"

3. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

X — —

END LOADER & SHOVELS

Indicate the volume of water and/or foam available for fire control:

WASTE IS NONFLAMMABLE BAG HOUSE DUST

(C) Testing and Maintenance of  
Emergency Equipment:

1. Has the owner or operator  
established testing and  
maintenance procedures  
for emergency equipment?

X — —

2. Is emergency equipment  
maintained in operable  
conditions?

X — —

(D) Has owner or operator provided  
immediate access to internal  
alarms? (if needed)

X — —

TELEPHONE

(E) Is there adequate aisle space for unobstructed movement?

X

N/A

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:  
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the following information:

Yes No NI\* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)

X

2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?

X

ARRANGEMENTS WITH K.I.D., THE CONTRACTOR, FOR MOVEMENT TO STORAGE AREA; BECAUSE OF NATURE OF WASTE, OTHER ORGANIZATIONS NEED NOT BE NOTIFIED.

3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?

X

4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?

X

LOCATION OF EQUIPMENT NOT IDENTIFIED

5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

X

N/A



# V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan - available at site and local emergency organizations?	<u>X</u>	___	___	<u>ON SITE - NOT CURRENTLY NEEDED AT LOCAL EMERGENCY ORGANIZATIONS</u>
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<u>X</u>	___	___	<u>GENE SARTORI or CARROL UTLEY</u>
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	___	___	___
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	___	___	___
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	___	___	<u>X</u>	<u>NO OCCURRENCE</u>

## VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	___	___	<u>N/A</u>	<u>NO WASTE SHIPPED OFF SITE</u>
2. Are records of past shipments retained for 3 years?	___	___	<u>N/A</u>	<u>"</u>
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	___	___	<u>N/A</u>	<u>"</u>

\*Not Inspected

## (C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

X

RECORD IS IN ROUGH  
FORM; NOT YET  
ASSEMBLED AS A SINGLE  
DOCUMENT

2. Does the operating record contain the following information:

- \*\*b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

X

DATES K.I.D. MOVED  
WASTE FROM BAG HOUSE  
TO PILE

- c. The location and quantity of each hazardous waste within the facility?

X

QUANTITIES ARE  
VOLUME ESTIMATES

- \*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

X

N/A

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X

WASTE ANALYSES AND  
INSPECTIONS OF BAG  
HOUSE ONLY

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

X

NONE REQUIRED

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

X

NO DOCUMENTED  
CLOSURE PLAN

\*\* See page 33252 of the May 19, 1980, Federal Register.

\*\*\* Only applies to disposal facilities



VII. CLOSURE AND POST CLOSURE  
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				
1. Is the facility closure plan available for inspection by May 19, 1981?	<u>  X  </u>			
2. Has this plan been submitted to the Regional Administrator	<u>  X  </u>			<u>CLOSURE HAS NOT</u> <u>BEGUN</u>
3. Has closure begun?	<u>  X  </u>			
4. Is closure estimate available by May 19, 1981?	<u>  X  </u>			
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)				
			<u>  X  </u>	

VIII. FACILITY STANDARDS  
(Part 265, Subparts I thru R)

I  
USE AND MANAGEMENT OF CONTAINERS

Facility Name: \_\_\_\_\_ Date of Inspection: \_\_\_\_\_

	Yes	No	NI*	Remarks
1. Are containers in good condition?			<u>  X  </u>	<u>NO CONTAINERS;</u>
2. Are containers compatible with waste in them?			<u>  X  </u>	"
3. Are containers stored closed?			<u>  X  </u>	"
4. Are containers managed to prevent leaks?			<u>  X  </u>	"
5. Are containers inspected weekly for leaks and defects?			<u>  X  </u>	"
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)			<u>  X  </u>	"

L

## WASTE PILES

Facility Name: BIRMINGHAM BOLTDate of Inspection: 7/13/84

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	<u>X</u>	<u>---</u>	<u>---</u>	<u>WASTE IS PLACED INTO A HOLE EXCAVATED OUT OF A MOUND OF DIRT</u>
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>SINGLE WASTE STREAM</u>
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	<u>---</u>	<u>X</u>	<u>---</u>	<u>NO PROTECTION FROM DIRECT PRECIPITATION OR RUN-ON IN ACTIVE AREA</u>
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>NON REACTIVE &amp; NON IGNITABLE</u>
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>"</u>
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>NO INCOMPATIBLE WASTES</u>
7. Are piles of incompatible waste protected by barriers or distance from other waste?	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>"</u>



	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	—	—	N/A	NO CHEMICAL, PHYSICAL OR BIOLOGICAL TREATMENT
4. Are inspection procedures followed according to 265.403?	—	—	N/A	"
5. Are the special requirements fulfilled for ignitable or reactive wastes?	—	—	N/A	"
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	—	—	N/A	"

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

#### IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

#### 1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	—	—	X	ALL WASTE CURRENTLY ON-SITE
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				"
1. Manifest document number?	—	—	X	
2. Name, mailing address, telephone number, and EPA ID Number of Generator	—	—	X	"

	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	___	___	<u>X</u>	ALL WASTE CURRENTLY ON-SITE
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	___	___	<u>X</u>	"
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	___	___	<u>X</u>	"
6. The total quantity of waste(s) and the type and number of containers loaded?	___	___	<u>X</u>	"
7. Required certification?	___	___	<u>X</u>	"
8. Required signatures?	___	___	<u>X</u>	"
(C) Does the owner or operator submit exception reports when needed?	___	___	<u>X</u>	"

## 2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	___	___	<u>X</u>	ALL WASTE CURRENTLY ON SITE AS WASTEPILE
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	___	___	<u>X</u>	"
(C) If required, are placards available to transporters of hazardous waste?	___	___	<u>X</u>	"



VI. RECORDKEEPING and REPORTING  
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	___	<u>X</u>	___	<u>ALL WASTE CURRENTLY ON-SITE; ANALYSES AVAILABLE; NO ANNUAL REPORTS</u>
(B) Has the generator submitted Annual Reports and Exception Reports as required?	___	<u>X</u>	___	<u>NO ANNUAL REPORTS</u>

VII. INTERNATIONAL SHIPMENTS  
(Part 262, Subpart E)

	Yes	No	NI*	Remarks
Has the installation imported or exported Hazardous Waste?	___	<u>X</u>	___	___

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:				
a. Notified the Administrator in writing?	___	___	<u>N/A</u>	<u>NO EXPORTS</u>
b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?	___	___	<u>N/A</u>	"
c. Met the Manifest requirements?	___	___	<u>N/A</u>	"
2. Importing Hazardous Waste, has the generator:				
Met the manifest requirements?	___	___	<u>N/A</u>	<u>NO IMPORTS</u>

## REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

At the time of the inspection normal operations were stopped for annual vacations and maintenance. During normal operations approximately 20 tons of molten steel are produced every 2 hours from each of 2 electric arc furnaces. The facility manufactures smooth rounds and #4 to #11 reinforcing rod from steel scrap. Total annual production is approximately 100,000 tons.

Since 1981 the company has stored baghouse dust in on-site waste piles. Storage is above grade using a large pile of soil into which cells have been excavated. 3 such cells are now filled and according to Gene Sartori total waste stored is approximately 1800 cubic yards. The dust is captured in a 20 yard roll-off box at the baghouse and transported by Kankakee Industrial Disposal to the storage area. The 4th, and only active cell, is protected from wind but not from direct precipitation or run-on. No cover is applied until the cell is filled at which time a soil "cap" is provided. No alternate area has been designated for bad weather and no monitor wells are on site. The dust has been analyzed and is EP Toxic for cadmium (D006) and lead (D008).

Apparent violations at the time of the inspection are: 35 Ill. Adm. Code 700.105, 725.111, 725.115, 725.116, 725.152, 725.173, 725.175, 725.212 and 725.353.





TO: DIVISION FILE DATE: 5/10/85  
FROM: TIM WOJCIK ☒ Information only  
SUBJECT: 0910150004/ KANKAKEE COUNTY ☐ Response requested  
BOURBONNAIS/ BIRMINGHAM BOLT  
ILD 980996862

SITE ACTIVITY: MFR  $\frac{7}{16}$ " ROUNDS AND  
REINFORCING ROD FROM SCRAP STEEL  
IN ELECTRIC FURNACES

WASTE: (a) DAILY GENERATION: BAG HOUSE DUST  
(b) STORAGE: BAGHOUSE DUST +  
CONTAMINATED SOIL (TO THE  
EXTENT IT EXISTS)

VOLUME: (a) VARIABLE, DEPENDING ON STEEL  
PRODUCTION BUT  $> 1000$  KG/MONTH  
(b) ADDRESSED IN CLOSURE PLAN

TSD: (a) BFI - CEROS  
(b) PEORIA DISPOSAL

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STATUS: (a) GENERATOR  
(b) STORAGE (UNTIL RCRA CLOSED)

This memo supplements information  
contained in an I.S.S. inspection report  
dated 4/30/85. Two (2) waste streams





I.S.S.

## MEMORANDUM

TO: DIVISION FILE DATE: 5/10/85  
FROM: JIM WOJCIK ☒ Information only  
SUBJECT: 0910150004 / KANKAKEE COUNTY ☐ Response requested  
BOURBONNAIS / BIRMINGHAM BOLT  
ILD 980996862

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of K061 bag house dust are currently being removed from the site. Daily generation is removed under manifest and permit (841440) by BFI to CECO. Dedicated 20 yard roll-off boxes are supplied by BFI and monitored by B. Bolt personnel.

The clean up currently underway is organized according to the chart in the remarks section of the inspection report. Trucks being used, by Fort Transport, are first plastic lined at a staging area near the site entrance. After empty weight is recorded, each receives the excavated dust from the waste piles up to the legal highway limit (73,280#). The volume/weight information is added to the other waste completed manifests and the necessary copies are delivered to the driver. The plastic liner is folded over the dust and an additional tarp is used to contain the load, all of which then receives a final inspection before being allowed off site. Only designated





## ILLINOIS ENVIRONMENTAL PROTECTION AGENCY

1.S.S.

## MEMORANDUM

TO: Division File DATE: 5/10/85  
FROM: Jim Wojcik ☒ Information only  
SUBJECT: 0910150004/KANKAKEE COUNTY ☐ Response requested  
BOURBONNAIS/ BIRMINGHAM BOAT  
140 980 996 862

stops for fuel, food, etc between B. Boat and the disposal site, Peoria Disposal, are permitted by the hauler. Gene Therios, from Disposal Alternatives, was present during a portion of the inspection and also viewed clean-up operations.

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0910150004  
STATE IDENTIFICATION NUMBER  
(If Applicable)

DIVISION FILE

ILD 980996862  
EPA IDENTIFICATION NUMBER

RCRA INSPECTION REPORT - INTERIM STATUS STANDARDS  
TREATMENT, STORAGE, AND DISPOSAL FACILITIES  
Form A - General Facility Standards

I. General Information:

- (A) Facility Name: BIRMINGHAM BOLT CO., INC. ILL. STEEL DIV.  
(B) Street: ROUTE 50 @ MCKNIGHT RD.  
(C) City: BOURBONNAIS (D) State: IL. (E) Zip Code: 60914  
(F) Phone: 815/937-3131 (G) County: KANKAKEE  
(H) Operator: BIRMINGHAM BOLT CO., INC. ILL. STEEL DIV.  
(I) Street: P.O. BOX 628  
(J) City: KANKAKEE (K) State: IL. (L) Zip Code: 60901  
(M) Phone: 815/937-3131 (N) County: KANKAKEE  
(O) Owner: BIRMINGHAM BOLT CO., INC.  
(P) Street: P.O. BOX 1208  
(Q) City: BIRMINGHAM (R) State: AL. (S) Zip Code: 35201  
(T) Phone: 205/871-9290 (U) County: JEFFERSON  
(V) Date of Inspection: 4/30/85 (W) Time of Inspection (From) 9:30a (To) 3:30p  
(X) Weather Conditions: SUNNY, 60°F

PAGES 10, 11, 13-18, 21 & 23 DO NOT APPLY  
AND HAVE BEEN REMOVED.

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Rev. 3-6-81/J.B.



(Y)	Person(s) Interviewed	Title	Telephone
	<u>SID MORGAN</u>	<u>SAFETY DIRECTOR</u>	<u>205/871-9290</u>
	<u>GENE SARTORI</u>	<u>GENERAL MGR.</u>	<u>815/937-3131</u>
	<u>ED MAYNARD</u>	_____	<u>815/937-3131</u>
(Z)	Inspection Participants	Agency/Title	Telephone
	<u>JAMES WOJCIK</u>	<u>IEPA/EPS</u>	<u>312/345-9780</u>
	_____	_____	_____
	_____	_____	_____
(AA)	Preparer Information		
	Name	Agency/Title	Telephone
	<u>JAMES WOJCIK</u>	<u>IEPA/EPS</u>	<u>312/345-9780</u>

## II. SITE ACTIVITY:

Complete sections I through VII for all treatment, storage, and/or disposal facilities. Complete the forms (in parenthesis) in section VIII corresponding to the site activities identified below:

- 4   A. Storage and/or Treatment
1. Containers (I)
  2. Tanks (J)
  3. Surface Impoundments (K)
  4. Waste Piles (L)

       B. Land Treatment (M)

       C. Landfills (N)

       D. Incineration and/or Thermal Treatment  
(O and P)

       E. Chemical, Physical, and Biological  
Treatment (Q)

Note: If facility is also a generator or transporter of hazardous waste complete sections IX and X of this form as appropriate.

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III. GENERAL FACILITY STANDARDS:  
(Part 265 Subpart B)

	Yes	No	NI*	Remark
(A) Has the Regional Administrator been notified regarding:				
1. Receipt of hazardous waste from a foreign source?	<u>      </u>	<u>      </u>	<u>N/A</u>	<u>NO RECEIPT</u>
2. Facility expansion?	<u>      </u>	<u>      </u>	<u>N/A</u>	<u>NO EXPANSION</u>
(B) General Waste Analysis:				
1. Has the owner or operator obtained a detailed chemical and physical analysis of the waste?	<u>X</u>	<u>      </u>	<u>      </u>	
2. Does the owner or operator have a detailed waste analysis plan on file at the facility?	<u>X</u>	<u>      </u>	<u>      </u>	<u>CHARACTERISTICS OF WASTE PILE IN CLOSURE PLAN; DAILY GENERATION IS KOB (LISTED) WASTE.</u>
3. Does the waste analysis plan specify procedures for inspection and analysis of each movement of hazardous waste from off-site?	<u>X</u>	<u>      </u>	<u>      </u>	
(C) Security - Do security measures include: (if applicable)				
1. 24-Hour surveillance?	<u>X</u>	<u>      </u>	<u>      </u>	<u>GUARD SERVICE</u>
2. Artificial or natural barrier around facility?	<u>X</u>	<u>      </u>	<u>      </u>	
3. Controlled entry?	<u>X</u>	<u>      </u>	<u>      </u>	
4. Danger sign(s) at entrance?	<u>X</u>	<u>      </u>	<u>      </u>	
(D) Do Owner or Operator Inspections Include:				
1. Records of malfunctions?	<u>X</u>	<u>      </u>	<u>      </u>	<u>BAGHOUSE</u>
2. Records of operator error?	<u>X</u>	<u>      </u>	<u>      </u>	<u>"</u>
3. Records of discharges?	<u>X</u>	<u>      </u>	<u>      </u>	<u>"</u>

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### III. GENERAL FACILITY STANDARDS - Continued

	Yes	No	NI*	Remarks
4. Inspection schedule?	<u>X</u>	<u>---</u>	<u>---</u>	<u>BAGHOUSE</u>
5. Safety, emergency equipment?	<u>X</u>	<u>---</u>	<u>---</u>	<u>ALARM @ BAGHOUSE</u>
6. Security devices?	<u>X</u>	<u>---</u>	<u>---</u>	<u>IF OVERHEATING</u>
7. Operating and structural devices?	<u>X</u>	<u>---</u>	<u>---</u>	<u>BAGHOUSE</u>
8. Inspection log?	<u>X</u>	<u>---</u>	<u>---</u>	<u>"</u>
(E) Do personnel training records include: (Effective 5/19/81)				
1. Job titles?	<u>X</u>	<u>---</u>	<u>---</u>	<u>PHIL HOYLMAN</u>
2. Job descriptions?	<u>X</u>	<u>---</u>	<u>---</u>	<u>RESPONSIBLE;</u>
3. Description of training?	<u>X</u>	<u>---</u>	<u>---</u>	<u>---</u>
4. Records of training?	<u>X</u>	<u>---</u>	<u>---</u>	<u>---</u>
5. Have facility personnel received required training by 5-19-81?	<u>X</u>	<u>---</u>	<u>---</u>	<u>---</u>
6. Do new personnel receive required training within six months?	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>NO NEW PERSONNEL</u>
(F) If required are the following special requirements for ignitable, reactive, or incompatible wastes addressed?				
1. Special handling?	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>CONSISTENT KOGI</u>
2. No smoking signs?	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>WASTE STREAM;</u>
3. Separation and protection from ignition sources?	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>NON-IGNITABLE,</u> <u>NON-REACTIVE;</u>

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IV. PREPAREDNESS AND PREVENTION:  
(Part 265 Subpart C)

(A) Maintenance and Operation  
of Facility:

Is there any evidence of fire,  
explosion, or release of  
hazardous waste or hazardous  
waste constituent?

Yes No NI\* Remarks

— X —

(B) If required, does the facility  
have the following equipment:

1. Internal communications or  
alarm systems?

X — —

TELEPHONE  
ALARM AT BAGHOUSE  
IF OVERHEATING

2. Telephone or 2-way radios  
at the scene of operations?

X — —

3. Portable fire extinguishers,  
fire control, spill control  
equipment and decontamination  
equipment?

X — —

Indicate the volume of water and/or foam available for fire control:

WASTE IS K061 BAGHOUSE DUST

(C) Testing and Maintenance of  
Emergency Equipment:

1. Has the owner or operator  
established testing and  
maintenance procedures  
for emergency equipment?

X — —

2. Is emergency equipment  
maintained in operable  
conditions?

X — —

(D) Has owner or operator provided  
immediate access to internal  
alarms? (if needed)

X — —

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DAILY GENERATION  
CONTAINED IN 20  
YARD ROLL-OFF;  
STORAGE IN WASTE  
PILE;

(E) Is there adequate aisle space  
for unobstructed movement?

N/A

V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES:  
(Part 265 Subpart D)

(A) Does the Contingency Plan contain the  
following information:

Yes No NI\* Remarks

1. The actions facility personnel must take to comply with §265.51 and 265.56 in response to fires, explosions, or any unplanned release of hazardous waste? (If the owner has a Spill Prevention, Control, and Counter-measures (SPCC) Plan, he needs only to amend that plan to incorporate hazardous waste management provisions that are sufficient to comply with the requirements of this Part (as applicable.)
2. Arrangements agreed by local police departments, fire departments hospitals, contractors, and State and local emergency response teams to coordinate emergency services pursuant to §265.37?
3. Names, addresses, and phone numbers (office and home) of all persons qualified to act as emergency coordinators?
4. A list of all emergency equipment at the facility which includes the location and physical description of each item on the list and a brief outline of its capabilities?
5. An evacuation plan for facility personnel where there is a possibility that evacuation could be necessary? (This plan must describe signal(s) to be used to begin evacuation, evacuation routes, and alternate evacuation routes?)

— X —

— X —

X — —

X — —

— — X

NOT DOCUMENTED

N/A

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# V. CONTINGENCY PLAN AND EMERGENCY PROCEDURES - Continued

	Yes	No	NI*	Remarks
(B) Are copies of the Contingency Plan available at site and local emergency organizations?	<u>  </u>	<u>X</u>	<u>  </u>	
(C) Emergency Coordinator				
1. Is the facility Emergency Coordinator identified?	<u>X</u>	<u>  </u>	<u>  </u>	<u>GENE SARTORI</u> <u>OR</u> <u>CARROL UTLEY</u>
2. Is coordinator familiar with all aspects of site operation and emergency procedures?	<u>X</u>	<u>  </u>	<u>  </u>	
3. Does the Emergency Coordinator have the authority to carry out the Contingency Plan?	<u>X</u>	<u>  </u>	<u>  </u>	
(D) Emergency Procedures				
If an emergency situation has occurred at this facility, has the Emergency Coordinator followed the emergency procedures listed in 265.56?	<u>  </u>	<u>  </u>	<u>X</u>	<u>NO OCCURRENCE</u>

## VI. MANIFEST SYSTEM, RECORDKEEPING, AND REPORTING (Part 265 Subpart E)

	Yes	No	NI*	Remarks
(A) Use of Manifest System				
1. Does the facility follow the procedures listed in §265.71 for processing each manifest?	<u>X</u>	<u>  </u>	<u>  </u>	
2. Are records of past shipments retained for 3 years?	<u>  </u>	<u>  </u>	<u>X</u>	<u>DAILY GENERATION</u> <u>REMOVAL BEGAN</u> <u>3/19/85; CLEAN UP</u> <u>BEGAN 4/29/85;</u>
(B) Does the owner or operator meet requirements regarding manifest discrepancies?	<u>  </u>	<u>  </u>	<u>N/A</u>	<u>NO DISCREPANCIES</u>

\*Not Inspected



# VI. RECORDKEEPING - Continued

## (C) Operating Record

1. Does the owner or operator maintain an operating record as required in 265.73?

X — — —

2. Does the operating record contain the following information:

- \*\*b. The method(s) and date(s) of each waste's treatment, storage, or disposal as required in Appendix I?

X — — —

- c. The location and quantity of each hazardous waste within the facility?

X — — —

- \*\*\*d. A map or diagram of each cell or disposal area showing the location and quantity of each hazardous waste? (This information should be cross-referenced to specific manifest number, if waste was accompanied by a manifest.)

— — — N/A

STORAGE

- e. Records and results of all waste analyses, trial tests, monitoring data, and operator inspections?

X — — —

- f. Reports detailing all incidents that required implementation of the Contingency Plan?

— — — N/A

NO INCIDENT.

- g. All closure and post closure costs as applicable? (Effective 5-19-81)

X — — —

CLOSURE PLAN  
ACCEPTED 3/18/85;

SEE C.I.L DATED  
4/4/85 FOR  
ADDITIONAL  
INFORMATION;

\*\* See page 33252 of the May 19, 1980, Federal Register.

\*\*\* Only applies to disposal facilities

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VII. CLOSURE AND POST CLOSURE  
(Part 265 Subpart G)

	Yes	No	NI*	Remarks
(A) Closure and Post Closure				<i>CLOSURE PLAN DATED DEC. 17, 1984; MAR 11, 1985 APPROVED;</i>
1. Is the facility closure plan available for inspection by May 19, 1981?	<u>—</u>	<u>X</u>	<u>—</u>	
2. Has this plan been submitted to the Regional Administrator?	<u>X</u>	<u>—</u>	<u>—</u>	
3. Has closure begun?	<u>X</u>	<u>—</u>	<u>—</u>	<u>4/29/85</u>
4. Is closure estimate available by May 19, 1981?	<u>X</u>	<u>—</u>	<u>—</u>	
(B) Post closure care and use of property				
Has the owner or operator supplied a post closure monitoring plan? (effective by May 19, 1981)	<u>—</u>	<u>—</u>	<u>X</u>	<i>SEE 725.358(b)</i>

VIII. FACILITY STANDARDS  
(Part 265, Subparts I thru R)

I  
USE AND MANAGEMENT OF CONTAINERS

Facility Name: N/A Date of Inspection: N/A

	Yes	No	NI*	Remarks
1. Are containers in good condition?	<u>—</u>	<u>—</u>	<u>N/A</u>	<u>NO CONTAINER STORAGE</u>
2. Are containers compatible with waste in them?	<u>—</u>	<u>—</u>	<u>—</u>	
3. Are containers stored closed?	<u>—</u>	<u>—</u>	<u>—</u>	
4. Are containers managed to prevent leaks?	<u>—</u>	<u>—</u>	<u>—</u>	
5. Are containers inspected weekly for leaks and defects?	<u>—</u>	<u>—</u>	<u>—</u>	
6. Are ignitable & reactive wastes stored at least 15 meters (50 feet) from the facility property line? (Indicate if waste is ignitable or reactive.)	<u>—</u>	<u>—</u>	<u>—</u>	

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## WASTE PILES

Facility Name: BIRMINGHAM BOLTDate of Inspection: 4/30/85

	Yes	No	NI*	Remarks
1. Are waste piles covered or protected from dispersal by wind?	<u>X</u>	<u>---</u>	<u>---</u>	<u>---</u>
2. Is each in-coming movement of waste analyzed before being added to the waste pile?	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>NO FURTHER ADDITIONS TO WASTE PILE</u>
3. Are leachate, run-off, and run-on controlled as per the requirements of 265.258? (The effective date of this provision is Nov. 19, 1981.)	<u>X</u>	<u>---</u>	<u>---</u>	<u>---</u>
4. Are reactive & ignitable wastes rendered non-reactive or non-ignitable before storage in a pile? Indicate if waste is ignitable or reactive. (If waste is rendered non-reactive or non-ignitable, see treatment requirements.)	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>NON-REACTIVE NON-IGNITABLE, KOLI BAGHOUSE DUST</u>
5. Are piles of reactive or ignitable waste protected from materials or conditions that might cause them to ignite or react?	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>"</u>
6. Are incompatible wastes stored in different piles? (If not, the provisions of 40 CFR 265.17(b) apply.)	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>CONSISTENT WASTE STREAM</u>
7. Are piles of incompatible waste protected by barriers or distance from other waste?	<u>---</u>	<u>---</u>	<u>N/A</u>	<u>"</u>

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	Yes	No	NI*	Remarks
3. Has the owner or operator addressed the waste analysis requirements of 265.402?	—	—	N/A	<u>NO TREATMENT</u>
4. Are inspection procedures followed according to 265.403?	—	—	N/A	"
5. Are the special requirements fulfilled for ignitable or reactive wastes?	—	—	N/A	"
6. Are incompatible wastes treated? (If yes, 265.17(b) applies.)	—	—	N/A	"

Note: EPA has temporarily suspended the applicability of the requirements of the hazardous waste regulations in 40 CFR Parts 122, 264 and 265 to owners and operators of (1) wastewater treatment tanks that receive, store, and treat wastewaters that are hazardous waste or that generate, store or treat a wastewater treatment sludge which is a hazardous waste where such wastewaters are subject to regulation under Sections 402 or 307(b) of the Clean Water Act (33 U.S.C. 1251 et seq.) and (2) neutralization tanks, transport vehicles, vessels, or containers which neutralize wastes which are hazardous only because they exhibit the corrosivity characteristic under 40 CFR §261.22 or are listed as hazardous wastes in Subpart D of 40 CFR Part 261 only for this reason.

#### IX

Complete this section if the owner or operator of a TSD facility also generates hazardous waste that is subsequently shipped off-site for treatment, storage, or disposal.

#### 1. MANIFEST REQUIREMENTS

	Yes	No	NI*	Remarks
(A) Does the operator have copies of the manifest available for review?	<u>X</u>	—	—	—
(B) Do the manifest forms reviewed contain the following information: (If possible, make copies of, or record information from, manifest(s) that do not contain the critical elements)				
1. Manifest document number?	<u>X</u>	—	—	—
2. Name, mailing address, telephone number, and EPA ID Number of Generator	<u>X</u>	—	—	—

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	Yes	No	NI*	Remarks
3. Name and EPA ID Number of Transporter(s)?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
4. Name, address, and EPA ID Number of Designated permitted facility and alternate facility?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
5. The description of the waste(s) (DOT shipping name, DOT hazard class, DOT identification number)?	<u>  </u>	<u>X</u>	<u>  </u>	<u>EFFECTIVE 4/30/85</u> <u>NA 9188 CHANGED</u> <u>TO NA 9189;</u>
6. The total quantity of waste(s) and the type and number of containers loaded?	<u>X</u>	<u>  </u>	<u>  </u>	<u>TOTAL QUANTITY</u>
7. Required certification?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
8. Required signatures?	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
(C) Does the owner or operator submit exception reports when needed?	<u>  </u>	<u>  </u>	<u>N/A</u>	<u>NONE NEEDED</u>

## 2. PRE-TRANSPORT REQUIREMENTS

(A) Is waste packaged in accordance with DOT Regulations? (Required prior to movement of hazardous waste off-site)	<u>X</u>	<u>  </u>	<u>  </u>	<u>DEDICATED ROLL-OFF</u> <u>FOR DAILY GENERA-</u> <u>TION; PHYSICAL</u> <u>INSPECTION BY</u> <u>DON SHUMAKER</u> <u>OF CLEAN-UP</u> <u>TRANSPORT -</u> <u>PERFORMANCE</u> <u>TEST;</u>
(B) Are waste packages marked and labeled in accordance with DOT regulations concerning hazardous waste materials? (Required to movement of hazardous waste off-site)	<u>X</u>	<u>  </u>	<u>  </u>	<u>  </u>
(C) If required, are placards available to transporters of hazardous waste?	<u>  </u>	<u>  </u>	<u>N/A</u>	<u>NONE REQUIRED</u>



VI. RECORDKEEPING and REPORTING  
(Part 262, Subpart D)

	Yes	No	NI*	Remarks
(A) Are Manifests, Annual Reports, Exception Reports, and all test results and analyses retained for at least three years?	—	—	<u>X</u>	DAILY GENERATION REMOVAL BEGAN 3/19/85; CLEAN-UP BEGAN 4/29/85;
(B) Has the generator submitted Annual Reports and Exception Reports as required?	<u>X</u>	—	—	_____

VII. INTERNATIONAL SHIPMENTS  
(Part 262, Subpart E)

Has the installation imported or exported Hazardous Waste?

— X —

(If answered Yes, complete the following as applicable.)

1. Exporting Hazardous waste, has a generator:

a. Notified the Administrator in writing?

— — N/A

b. Obtained the signature of the foreign consignee confirming delivery of the waste(s) in the foreign country?

— — N/A

c. Met the Manifest requirements?

— — N/A

2. Importing Hazardous Waste, has the generator:

Met the manifest requirements?

— — N/A

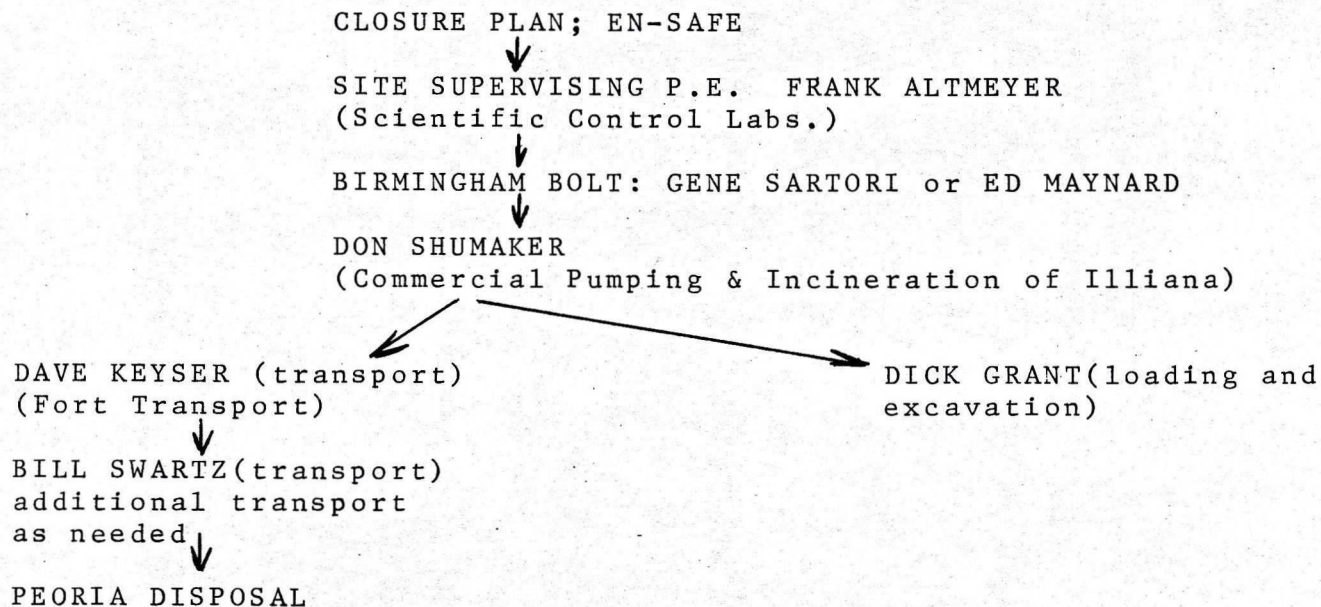


## REMARKS

Use this section to briefly describe site activities observed at the time of the inspection. Note any possible violations of Interim Status Standards.

Birmingham Bolt is a manufacturer of 9/16 rounds and reinforcing rod from scrap steel in electric arc furnaces. At the time of the inspection disposal of daily generated baghouse dust (K061) had begun. BFI has provided dedicated roll-off boxes which are hauled to CECOS for disposal under permit# 841440.

Closure has also begun on the waste piles that had been used for storage. The clean-up is being performed according to the following organizational chart:



Violations noted during the inspection were: 725.152, a completed contingency plan was not available on site, 725.153, copies of the plan had not been distributed to local emergency organizations and 722.121, the incorrect DOT identification number had been used.

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